

ID / Number	Received Paid On	Class	Effective/ Expiration	Assigned To	Validation	TotalPaid/ Required	QA / Application Status	Application Type	Actions
786855 02-09146	09/10/2019	Z	10/01/2019 09/30/2020	michelld	E238658	\$65.00 \$65.00	COMPLETE Approved	Non-Profit Raffle Renewal	 
09/10/2019 E238658 2050000230721 The NRA Foundation					\$65.00	Online NonProfit Renew 02-09146		License Fee	
<hr/>									
761151 02-09146	08/23/2018	Z	10/01/2018 09/30/2019	shannons	E188764*	\$1,935.00 \$1,935.00	COMPLETE Approved	Non-Profit Raffle Renewal	 
08/23/2018 E188764 2050000230721 The NRA Foundation, Inc.					\$65.00	Online NonProfit Renew 02-09146		License Fee	
01/18/2019 E215350 2050000230721 The NRA Foundation, Inc. QLR					\$1,870.00	2018-4: 227605.00 x 0.03380 = 1935.00, Base Fee Used: 65.00	QLF1		
04/23/2019 QLF \$0 FEE QLF NO FEE QLR					\$0.00	2019-1: 349920.00 x 0.03380 = 0.00, Base Fee Used: 0.00	QLF2		
07/03/2019 QLF \$0 FEE QLF NO FEE QLR					\$0.00	2019-1: 348220.00 x 0.03380 = 0.00, Base Fee Used: 0.00	QLF2		
07/26/2019 QLF \$0 FEE QLF NO FEE QLR					\$0.00	2019-2: 330890.00 x 0.03380 = 0.00, Base Fee Used: 0.00	QLF3		
<hr/>									
735355 02-09146	11/02/2017	F	11/17/2017 09/30/2018	billr	E155948	\$1,360.00 \$1,360.00	COMPLETE Approved	Non-Profit Raffle Renewal	 
11/02/2017 E155948 2050000230721 The NRA Foundation, Inc.					\$1,360.00	Online NonProfit Renew 02-09146		License Fee	
<hr/>									
703402 02-09146	10/25/2016	F	11/17/2016 11/16/2017	catheeg	E120163	\$1,632.00 \$1,632.00	COMPLETE Approved	Non-Profit Raffle Renewal	 
10/25/2016 E120163 2050000230721 The NRA Foundation, Inc.					\$1,632.00	Online NonProfit Renew 02-09146		License Fee	
<hr/>									
678493 02-09146	10/27/2015	F	11/17/2015 11/16/2016	billr	E45579	\$1,632.00 \$1,632.00	COMPLETE Approved	Non-Profit Raffle Renewal	 
10/27/2015 E45579 2050000230721 The NRA Foundation, Inc.					\$1,632.00	Online NonProfit Renew 02-09146		License Fee	
<hr/>									
651102 02-09146	11/10/2014	F	11/17/2014 11/16/2015	claudiab	268406	\$1,632.00 \$1,632.00	COMPLETE Approved	Non-Profit Raffle Renewal	 
11/10/2014 268406 070275 THE NRA FOUNDATION					\$1,632.00			License Fee	
<hr/>									
626666 02-09146	11/14/2013	F	11/17/2013 11/16/2014	isabelc	258887	\$1,540.00 \$1,540.00	APPROVED Approved	Non-Profit Raffle Renewal	 

From: [McGregor, Bill \(GMB\)](#)
To: [Voss, Cassie \(GMB\)](#)
Subject: Fwd: Washington Friends of The NRA
Date: Wednesday, December 14, 2016 2:50:11 PM
Attachments: [image001.jpg](#)

Cassie, change of the physical address for org. # 00-22598 as we discussed. Thanks Bill

Sent from my iPhone

Begin forwarded message:

From: "Herrera, Michael" <MHerrera@nrahq.org>
Date: December 14, 2016 at 11:03:06 AM PST
To: "bill.mcgregor@wsgc.wa.gov" <bill.mcgregor@wsgc.wa.gov>
Subject: Washington Friends of The NRA

Hello Bill,

I would like to change our Premises address to 1617 E Main
#N106, Puyallup WA 98372.

Please let me know if you need anything else.

Thank you

Michael Herrera
Washington Field Rep.
National Rifle Association
Cell 360-355-6213
www.friendsofnra.org
www.nra.org

FNRA-banner=sm



Column1	Type	Subject	Object	Title	Start	End
246449	PrinciplesToPremises	1C	BATEMAN, LARRY D	00-22598	Chairman Of The Board	10/26/2016
232671	PrinciplesToPremises		DAZEY, STEVEN L	00-22598	Treasurer	10/28/2015
232669	PrinciplesToPremises		HERRERA, MICHAEL J	00-22598	Raffle Manager	10/28/2015
282170	PrinciplesToPremises		REITZ, NATHAN L	00-22598	Treasurer	9/11/2019
282171	PrinciplesToPremises		SHEEK, ANDREA M	00-22598	Chairman Of The Board	9/11/2019
246448	PrinciplesToPremises		UELTSCHI, MARC R	00-22598	President	10/26/2016
232670	PrinciplesToPremises		BATEMAN, LARRY D	00-22598	President	10/28/2015
193206	PrinciplesToPremises		CAMPBELL, ALLEN G	00-22598	Treasurer	10/24/2011
193205	PrinciplesToPremises		HILL, ERIC D	00-22598	Highest Ranking Member	10/24/2011
193208	PrinciplesToOrganization		LEWIS, KEIFER D	00-22598	Raffle Manager	10/24/2011
193207	PrinciplesToPremises		UELTSCHI, MARC R	00-22598	Chairman Of The Board	10/24/2011
193209	PrinciplesToPremises		VREELAND, STEVEN A	00-22598	Raffle Manager	10/24/2011

Modified By

SYSTEM

SYSTEM

SYSTEM

SYSTEM

SYSTEM

SYSTEM

GMB\CatheeG

GMB\BillR

GMB\BillR

GMB\IsabelC

GMB\CatheeG

GMB\CheryID

ID	Number	Type	Class	Effective Date	Expiration Date	Status	Date
519874	02-09146	Raffle	ClassZ	10/1/2019	9/30/2020	Approved	9/11/2019
497019	02-09146	Raffle	ClassZ	10/1/2018	9/30/2019	Active	10/1/2018
476087	02-09146	Raffle	ClassF	11/17/2017	9/30/2018	Renewed	10/1/2018
449110	02-09146	Raffle	ClassF	11/17/2016	11/16/2017	Renewed	11/17/2017
428680	02-09146	Raffle	ClassF	11/17/2015	11/16/2016	Renewed	11/17/2016
405846	02-09146	Raffle	ClassF	11/17/2014	11/16/2015	Renewed	11/17/2015
385006	02-09146	Raffle	ClassF	11/17/2013	11/16/2014	Renewed	11/17/2014
366788	02-09146	Raffle	ClassF	11/17/2012	11/16/2013	Renewed	11/17/2013
343585	02-09146	Raffle	ClassF	11/17/2011	11/16/2012	Lapse	11/18/2012

Column1

Edit ;



WASHINGTON STATE GAMBLING COMMISSION

N 901 Monroe, Room 240 Spokane, WA 99201
(509) 325-7900

Case Report

Type of Incident: - Exceeding \$300,000 in prizes paid on raffles

Disposition: NOI

Details of Disposition:

Subject/Suspect: NRA FOUNDATION INC/STATE FUND COMMITTEE

Phone: (703) 267-1255 Work

Phone: (509) 953-3378 Work

Mailing Address: 11250 WAPLES MILL RD FAIRFAX VA 22030

Premises Address: E 3419 4TH CT MEAD WA 99021

Org./Lic. Number: 00-22598

Date/Time Occurred:

Location of Incident: Statewide E 3419 4TH CT MEAD

Potential Claimants:

Case Agent: Dylan Milliron	Supervisor: Joshua Stueckle	Date Opened: 03/21/2014
		Date Closed: 03/24/2014

Licenses:

<u>License Number</u>	<u>Type</u>	<u>Expiration Date</u>
02-09146	02	11/16/2013

Violations:

WAC	230-11-067	Requesting approval to offer raffle prizes exceeding three hundred thousand dollars annually.
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Property Loss Amount:

Property Loss Description:

Related Cases:



WASHINGTON STATE GAMBLING COMMISSION

N 901 Monroe, Room 240 Spokane, WA 99201
(509) 325-7900

Case Report

Persons:

Name:	NRA FOUNDATION INC/STATE FUND COMMITTEE		License #:	Subject/Suspect
Mailing:	11250 WAPLES MILL RD FAIRFAX VA 22030		Work:	(703) 267-1255
Premises:	E 3419 4TH CT MEAD WA 99021		Work:	(509) 953-3378
Employer:				
Birth Date:	Email:			
Height:	Weight:	Eyes:	Sex:	Hair:
Race:	Skin Tone:	Build:	Title:	
Visible Marks:				
Aliases:				
Driver License:				
Comment:				

Name:	Keifer D Lewis		License #:	Secondary Suspect
Mailing:	PO BOX 126 Cinebar WA 98533		Home:	(360) 985-7749
Premises:			Work:	(253) 778-3068
Employer:	NRA Foundation Inc			
Birth Date:	Email:	KLEWIS@NRAHQ.ORG		
Height:	Weight:	Eyes:	Sex:	Male
Race:	Skin Tone:	Build:	Title: Raffle Manager	
Visible Marks:				
Aliases:				
Driver License:				
Comment:	Is in GIMS under his SSN			



WASHINGTON STATE GAMBLING COMMISSION

N 901 Monroe, Room 240 Spokane, WA 99201
(509) 325-7900

Case Report

Narrative:

On 19 March 2014, I received an email from Special Agent Supervisor Joshua Stueckle relating that the raffle licensee, NRA Foundation INC/State Fund Committee (00-22598) had paid out prizes in excess of \$300,000 (Attachment AT01). WAC 230-11-067 specifically states that raffle licensees must not exceed \$300,000 of prizes paid annually unless it has been approved by the Commission. Attached to the email was the Raffle Annual Activity Report for the NRA Foundation Inc and the licensing spreadsheet that identifies non-profits and their annual prize payout totals (Attachment AT02).

On 20 March 2014, at approximately 1317 hours, I contacted Keifer Lewis, the Manager at the NRA Foundation Inc/State Fund Committee via telephone. I asked him if he completed the Raffle yearly activity report for the non-profit and he stated he did. I also asked him if the non-profit had a total prizes paid of \$335,017 and he stated raffles did very well last year. I told Lewis that based on WAC 230-11-067(3) he must request from the Commission approval to exceed \$300,000 in prizes paid. Lewis claimed that he didn't know about the requirement and would do whatever he needed to do to fix it. I asked Lewis if he was expecting to pay out more than \$300,000 in future years and he stated yes. I told Lewis I would be sending him a Notice of Infraction (NOI) based on the violation of the above mentioned WAC (Attachment AT03). I told him I would send him a copy of WAC 230-11-067 (Attachment AT04) and Assistant Director of Licensing, Tina Griffin's number for future contact. I told Lewis I would email and send a hard copy of these in the mail.

On 21 March 2014, I sent Lewis an email with attachments containing the NOI, WAC, a copy of the Annual Activity Report, and Tina Griffin's contact information (Attachment AT05). I also sent him the originals of the aforementioned documents via mail to the proper address. The case is closed and an NOI issued.



WASHINGTON STATE GAMBLING COMMISSION

N 901 Monroe, Room 240 Spokane, WA 99201
(509) 325-7900

Case Report

Attachments:

Document ID	Description
2014-00571-AT01	Email for NRA Prizes over \$300K
2014-00571-AT02	Activity Report & Internal Spreadsheet
2014-00571-AT03	NRA Foundation NOI issued on 3-20-2014
2014-00571-AT04	NRA Foundation Inc WAC 230-11-067
2014-00571-AT05	Email sent to NRA Foundation for WAC violation

From: [Stueckle, Joshua \(GMB\)](#)
To: [Milliron, Dylan \(GMB\)](#)
Subject: FW: 230-11-067(3) prizes over \$300K
Date: Wednesday, March 19, 2014 4:05:36 PM
Attachments: [cy13 top10 annual raffle Prize totals_ to check 230-11-067\(3\) prizes over \\$300K.pdf](#)
[NRA Fdn annual raffle activity report.pdf](#)

Can you please follow up on this?

Thanks,
Josh

From: Drumheller, Gary (GMB)
Sent: Wednesday, March 19, 2014 3:59 PM
To: Stueckle, Joshua (GMB)
Subject: FW: 230-11-067(3) prizes over \$300K

See below.....

From: Harris, Mark (GMB)
Sent: Wednesday, March 19, 2014 3:55 PM
To: Drumheller, Gary (GMB)
Subject: FW: 230-11-067(3) prizes over \$300K

Hi Gary,

Please have the agent follow up on this violation and pass on Tina's contact information so they can make sure they comply with the rule and request approval this license year if needed. Please let me know how the agent handled the violation.

Thanks, Mark

From: Griffin, Tina (GMB)
Sent: Wednesday, March 19, 2014 2:52 PM
To: Harris, Mark (GMB)
Subject: FW: 230-11-067(3) prizes over \$300K

Hello Mark,

Every year Cameron checks to see if any raffle licensees awarded raffle prizes greater than \$300,000 during a license year to verify that we do not have any licensees in violation of WAC 230-11-067, offering prizes greater than \$300,000 without Commissioner approval. The NRA reported that they awarded \$335,000 in raffle prizes for during their license year November 17, 2012 to November 16, 2013. The NRA did not seek approval of the Commissioners during this license year prior to offering raffle prizes in excess of \$300,000.

Two years ago your agents made contact with the licensees that violated the rule. Will that be the same in this case? If so, could they pass along my contact information in case the licensee wants to

request Commission approval in the future?

Thank you,
Tina

From: Baker, Cameron (GMB)
Sent: Wednesday, March 19, 2014 12:22 PM
To: Griffin, Tina (GMB)
Cc: Schuster, Keith (GMB); Summers, Jay (GMB)
Subject: 230-11-067(3) prizes over \$300K

Hi Tina,
Am attaching a page from cy13's stat1d annual raffle listing, with the Top10 descending Prize totals.

It can also be found in <U:\FRS share\TinaG>.

One licensee appears to have reported more than \$300K in prizes last year [[see WAC 230-11-067 \(3\)](#)].

NRA Fdn 00-22598 02-09146, in line 1, reported prizes of \$335,017 in 2013 (scanned copy attached).

A Comment in GIMS has different name & contact phone number, if that might be useful.

<u>Comment Date</u>	<u>Comment Type</u>	<u>Comment By</u>	<u>Comment Text</u>
12/12/2013	TelephoneCall	CameronB	Jackie at HQ in Fairfax, Virginia called to clarify how to file annual report online. Her phone # is 703-267-1269 at general counsel's office.

I have not seen an indication that they submitted the required plan before offering more than \$300K prizes during their license year.

Please let me know if you have questions or need other items.

Thanks.

Cameron Baker, Research Analyst, Washington State Gambling Commission
PO Box 42400, Olympia, WA 98504-2400
800-345-2529 ext 3476 or 360-486-3476
360-486-3632 fax
cameron.baker@wsgc.wa.gov www.wsgc.wa.gov



102597

WASHINGTON STATE GAMBLING COMMISSION, P.O. BOX 42400, OLYMPIA, WA 98504-2400
(360) 486-3474

NRA FOUNDATION INC/STATE FUND COMMITTEE
E 3419 4TH CT
MEAD, WA 99021

Date: 12/13/2013 Class: F
Client No: 00-22598 License No: 02-09146
City: 00 County: SPOKANE

THIS REPORT COVERS THE PERIOD

11/17/2012 - 11/16/2013

RAFFLE

ANNUAL ACTIVITY REPORT

ATTENTION: All amounts are in whole dollars.

DUE DATE: **12/16/2013**

ANNUAL FINANCIAL INFORMATION

(1) GROSS GAMBLING RECEIPTS	\$629,936
(2) TOTAL PRIZES PAID (Purchased or Donated)	\$335,017
(3) DONATED PRIZES (Record fair market value) (should also be part of line 2)	\$0
(4) LOCAL GAMBLING TAX (Paid to City or County)	\$0
(5) CASH OVER/SHORT	<input type="checkbox"/> Over <input checked="" type="checkbox"/> Short \$0

SIGNATURE AND VERIFICATION - I declare under the penalties of perjury that this report (including any accompanying statements or lists) has been examined by me and to the best of my knowledge and belief is true, correct and complete.

Name Kefier Lewis
Title Manager

Daytime Phone (253) 778-3068
Date 12/13/2013

Ran k	Year Quarter	Client No	LIC- ISSU E-	COUN TY- CODE	NAME	FI- NET	FI- EXP	FI-EXP- OVS	FI-PRZ- MER	FI-PRZ- CSH	FI-GGR	Qcount	PRZ- PERCENT	OVS- PERCENT	TAX
1	2013-4	00-22598	02-09146	32	NRA FOUNDATION INC/STATE FU	0	0	0	0	335017	629936	1	53.18%	0.00%	0
2	2013-1	00-11750	02-02134	51	ROCKY MOUNTAIN ELK FOUNDA	0	0	0	0	294835	511677	1	57.62%	0.00%	0
3	2013-1	00-10345	02-01973	17	DUCKS UNLIMITED/WASHINGTON	0	0	0	0	105974	385809	1	27.46%	0.00%	0
7	2013-4	00-21599	02-08876	17	GARFIELD HIGH PTSA 6.15.467	0	0	0	0	92813	178080	1	52.11%	0.00%	0
5	2013-4	00-21771	02-08914	17	THUNDERBIRD COMMUNITY SPO	0	0	354	0	84221	204416	1	41.20%	0.17%	4289
6	2013-4	00-04339	02-00875	31	SEATTLE JUNIOR HOCKEY ASSN	0	0	336	0	84130	194790	1	43.19%	0.17%	2767
4	2013-3	00-09202	02-01842	32	SPOKANE SYMPHONY ASSOCIAT	0	0	93	0	82287	207021	1	39.74%	0.04%	0
11	2013-4	00-00276	02-08290	15	AMERICAN LEGION 00141	0	0	-634	0	81004	118737	1	68.22%	-0.53%	0
8	2013-4	00-06758	02-01503	18	ROTARY CLUB/SILVERDALE	0	0	0	0	52261	134009	1	38.99%	0.00%	0
13	2013-3	11853	02148	3	TRI-CITY HOCKEY BOOSTER CLU	0	0	85	0	45771	92953	1	49.24%	0.09%	0

Washington State Gambling Commission
Notice of Infraction



Licensee: NRA Foundation Inc/State Fund Committee City: Spokane Case Number: 2014-00571

Date: 3/20/2014 Organization Number: 00-22598

Name of Person Warned Keifer Lewis Title: Manager

(1) WAC: 230-11-067(3)

Description: Requesting commission approval prior to offering raffle prizes exceeding three hundred thousand dollars in a license year

(2) WAC: _____

Description: _____

(3) WAC: _____

Description: _____

THIS NOTICE OF INFRACTION, AS NOTED, IS A VIOLATION OF LAWS OR RULES. THIS IS BROUGHT TO YOUR ATTENTION, REQUESTING YOUR VOLUNTARY COOPERATION IN CORRECTING OR AVOIDING FUTURE VIOLATIONS. IF YOU HAVE QUESTIONS, PLEASE CONTACT YOUR LOCAL COMMISSION AGENT.

SPECIAL AGENT'S SIGNATURE: Dylan Milliron

DATE: 3/21/2014

GC3-97 04/05

Requesting commission approval prior to offering raffle prizes exceeding forty thousand dollars per prize or three hundred thousand dollars in a license year.

- (1) The commissioners may vote to approve a licensee to exceed raffle prize limits if a licensee shows good cause in writing.
- (2) Prior to offering raffle prizes that exceed forty thousand dollars per prize, the licensee must submit a raffle plan to us that includes at least the following information:
 - (a) The organization's goals for conducting the raffle; and
 - (b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and
 - (c) Specific details of the raffle rules including:
 - (i) Date of the drawing; and
 - (ii) Cost of raffle tickets; and
 - (iii) Prizes available; and
 - (iv) Security of prizes; and
 - (v) Plans for selling raffle tickets; and
 - (vi) Description of how the licensee protects the integrity of the raffle; and
 - (d) An explanation of how the proceeds from the raffle will be used; and
 - (e) A plan to protect the licensee in the event of low ticket sales and other risks; and
 - (f) An explanation of how the licensee will purchase the prize(s) for the raffle; and
 - (g) A projected budget including:
 - (i) Estimated gross gambling receipts, expenses, and net income for the raffle; and
 - (ii) Minimum number of projected ticket sales to break even; and
 - (iii) Corresponding sales and prize levels with projected revenues and expenses for each level; and
 - (iv) Minimum and maximum prizes available; and
 - (h) Any other information that we request or any information the licensee wishes to submit.
- (3) Prior to offering raffle prizes that exceed three hundred thousand dollars in a license year, the licensee must submit a raffle plan that includes:
 - (a) The organization's goals for conducting raffles; and
 - (b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and
 - (c) Plans for selling raffle tickets; and
 - (d) Brief overview of prizes awarded; and
 - (e) Estimated gross gambling receipts, expenses, and net income for the raffles; and
 - (f) Any other information that we request or any information the licensee wishes to submit.

[Statutory Authority: RCW [9.46.070](#) and 9.46.0277. WSR 12-05-067 (Order 677), § 230-11-067, filed 2/15/12, effective 3/17/12. Statutory Authority: RCW [9.46.070](#). WSR 10-11-086 (Order 668), § 230-11-067, filed 5/17/10, effective 7/1/10.]

From: Milliron, Dylan (GMB)
To: klewis@nrahq.org
Subject: NRA Foundation Inc/State Fund Committee WAC violation
Date: Friday, March 21, 2014 8:49:00 AM
Attachments: [NRA Foundation NOI issued on 3-20-2014.pdf](#)
[NRA Foundation Inc WAC 230-11-067.pdf](#)
[NRA Fdn annual raffle activity report.pdf](#)

Mr. Lewis, I have attached the Notice of Infraction (NOI) and WAC 230-11-067(3) that the non-profit violated. As stated in the phone call yesterday, this is a written warning of violation for paying out prizes in excess of \$300,000. If you would like to request commission approval in the future, please contact Assistant Director Tina Griffin at 1-800-345-2529, ext 3546. If you have any questions regarding the rule or the NOI, please feel free to contact me.

In addition, I need your address in Chehalis to send you the hard copy of this information. Please send as soon as possible and also contact Isabel Corrigan in Licensing 1-800-345-2529, ext 3520 to change the organization address to your Chehalis address for future correspondence.

Thank you

Dylan Milliron, Special Agent
Washington State Gambling Commission
Eastern Region
901 N. Monroe, Suite 240
Spokane WA 99201
Work: (509) 325-7912
Cell: (509) 385-5484
Fax: (509) 329-3674

*****CONFIDENTIALITY NOTICE*****

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WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

Type of Incident: Cheating - Accusation the person selling raffle tickets won too many prizes

Disposition: Warning Letter Sent

Details of Disposition:

Subject/Suspect: NRA FOUNDATION INC/STATE FUND COMMITTEE

Phone: (703) 267-1255 Work

Phone: (509) 953-3378 Work

Mailing Address: 11250 WAPLES MILL RD FAIRFAX VA 22030

Premises Address: E 3419 4TH CT MEAD WA 99021

Org./Lic. Number: 00-22598

Date/Time Occurred: 4/11/2015

Location of Incident: Nile Shrine Country Club 6601 244th St. SW Mountlake Terrace

Potential Claimants:

Case Agent:	Supervisor:	Date Opened: 05/14/2015
Danny Lisa	Karen Rea	Date Closed: 10/21/2015

Licenses:

<u>License Number</u>	<u>Type</u>	<u>Expiration Date</u>
02-09146	02	11/16/2015

Violations:

WAC	230-11-100	(1) Failure to maintain raffle records in the format required by the commission
WAC	230-11-025	(1)(c)(d) Failure to make single nondiscounted tickets available. Using more than one discount plan for each raffle.
WAC	230-11-100	(2)(c) Failure to maintain name, address, and telephone number of all winners of a prize with a fair market value
WAC	230-11-100	(2)(e) Failure to maintain all unsold tickets for individual raffles for which gross gambling receipts exceed five thousand dollars
WAC	230-07-130	(1) Failure to provide an audit trail satisfactory for us to verify that the funds were used for the licensee's stated purpose
RCW	9.46.0277	Conducting a raffle without raffle tickets. Combining the cost of a raffle ticket with the purchase of another item. Awarding raffle tickets as prizes during a live auction.
WAC	230-07-105	(2) Failure to maintain an inventory control record for each item purchased or donated to use as prizes
WAC	230-07-090	(1)(a)Failure to keep a separate gambling receipts account in a Washington state bank , mutual savings bank, or credit union.
WAC	230-07-090	(1)(c) Failure to deposit all gambling receipts first into the gambling account
WAC	230-07-090	(1)(e) Failure to make all deposits of net gambling receipts separate from all other deposits



WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

Property Loss Amount:

Property Loss Description:

Related Cases:



WASHINGTON STATE GAMBLING COMMISSION

**501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300**

Case Report

Persons:

Name: NRA FOUNDATION INC/STATE FUND COMMITTEE **License #:** 00-22598 **Subject/Suspect**

Mailing: 11250 WAPLES MILL RD FAIRFAX VA 22030 **Work:** (703) 267-1255

Premises: E 3419 4TH CT MEAD WA 99021 **Work:** (509) 953-3378

Employer:

Birth Date: **Email:**

Height: **Weight:** **Eyes:** **Sex:** **Hair:**

Race: **Skin Tone:** **Build:** **Title:**

Visible Marks:

Aliases:

Driver License:

Comment:

Name: **Bradley Kruger** License #: **Witness**
Mailing: _____ : (208) 305-0945
Premises: 217 Cedar Street Office #217 Sandpoint ID 83864 :
Employer: National Rifle Association
Birth Date: _____ Email: **bkruger@nrahq.org**
Height: _____ Weight: _____ Eyes: _____ Sex: Male Hair: _____
Race: White Skin Tone: _____ Build: _____ Title: NRA Western Region Director
Visible Marks:
Aliases:
Driver License:
Comment:

Name: **Kimber Bratsch** **License #:** **Witness**
Mailing: **Work:** (703) 267-1349
Premises: 11250 Waples Mill Road Fairfax VA 22030 **:**
Employer:
Birth Date: **Email:** kbratsch@nrahq.org
Height: **Weight:** **Eyes:** **Sex:** Female **Hair:**
Race: White **Skin Tone:** **Build:** **Title:** Compliance Manager
Visible Marks:
Aliases:
Driver License:
Comments:

Name: Michael Herrera **License #:** **Witness:**



WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

Mailing:	Work:
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Premises:	(360) 355-6213
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Employer:

Birth Date: Email: mherrera@nrahq.org

Height: Weight: Eyes: Sex: Male Hair:

Race: Hispanic/Latino Skin Tone: Build: Title: Field Representative

Visible Marks:

Aliases:

Driver License:

Comment:

Name:	Anonymous	License #:	Reporting Party
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Mailing:	:
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Premises:	:
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Employer:

Birth Date:	Email:
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Height:	Weight:	Eyes:	Sex:	Hair:
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Race:	Unknown	Skin Tone:	Build:	Title:
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Visible Marks:	:
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Aliases:	:
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Driver License:	:
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Comment:	:
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WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

Narrative:

On 5/14/2015 I received an email from Special Agent Supervisor Karen REA about a complaint the commission received from an anonymous person. The complaint was about the North Puget Sound Friends of NRA (National Rifle Association), an organization that held raffles on 4/11/2015 at the Nile Shrine Country Club in Mountlake Terrace. According to the complainant, "the person selling the bucket raffle tickets to attendees ended up winning about 50% of the 100+ items available. There was a chance to upgrade your ticket packages but didn't see any real way for the organization to track monies in/out with tickets sold. Did he win because he purchased, or helped himself to so many tickets?" The complainant suggested the commission should investigate the raffle or "at least put on the commissions' [SIC] "watch" list." The complainant attached two pages of a promotional flier about the event, attachment AT01.

According to the flier, the "Annual Event and Auction Fundraiser" was on behalf of the NRA Foundation. The NRA Foundation holds a class F raffle license. They hold raffles throughout the state under this license.

On 5/14/2015 I sent an email to the email address on the flier. A short time later, I received a call from a person named Bradley KRUGER who is the Western Region Director for the NRA. I explained the complaint to him and I asked to review the raffle records. He said he was on vacation and his field representative had the records. He asked if I could give them some time for him to return from vacation and for him to gather the records. He asked for the end of May. I said that would be fine.

On 6/3/2015 KRUGER sent me an email requesting more time. I replied and gave him more time.

On 6/19/2015 KRUGER sent me the records, attachment AT02. According to the records, at the event on 4/11/2015 there were 13 different raffles, four of which were alternative drawing format raffles called bucket raffles. The records were done on an Excel Spreadsheet and were not completed in the commission's prescribed format. Besides not being in the required format, the records were missing the following required information:

- There was no Merchandise Inventory Control Log;
- The date of the drawing(s) was not included;
- There were no beginning and ending ticket numbers;
- Expenses were not recorded;
- There was no net income for some raffles;
- There was no cash over/short;
- The records were not signed and dated;
- Some winner's names, addresses, and phone numbers were missing;
- There was no Total Prizes Paid; and
- There was no Raffle Ticket Distribution Log

The bucket raffles were the raffles the complainant mentioned. The raffle tickets were differentiated by color – white, red, blue, and gold. The colors of the buckets matched the colors of the tickets. These were separate raffles because each color cost a different amount. The white tickets were only sold in bundles of five tickets for \$20. There were no individual white tickets for sale. Red tickets cost \$20, Blue cost \$50, and Gold cost \$100. I noted the licensee also sold tickets as "packages," mixing tickets from more than one color. For example, for \$100, a player could buy a package of 25 white tickets, one red ticket, and one blue ticket. Without the package, individually these tickets would cost \$170. So buying the package saves the player \$70. Continuing with this package as an example, the records indicated the licensee sold 13 of these packages for a total of \$1,300. There was no way for me to determine the gross receipts of the individual white, red, and gold bucket raffles because the tickets were sold as a package and discounted. I later found out that the person who sold the raffle tickets for the bucket raffles was someone named Wiley McDONALD. According to the complainant, McDONALD won "about 50% of the 100+ items available." While reviewing the records, I noted there were 13 prizes that were more than \$50 and there were 44 prizes that were \$50 and less. Ten of the 13 prizes over \$50 had the winners' names recorded on the records. McDONALD was listed as winning three of those prizes. None of the winners' names were recorded for the prizes that were \$50 and less.

Because the licensee did not maintain a Raffle Ticket Distribution Log and they did not maintain the unsold tickets, I could not determine if McDONALD had merely been lucky or had "helped himself to so many tickets" as the complainant questioned.



WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

On 7/16/2015 I had a meeting with KRUGER at the commission's Everett office. Also present were Michael HERRERA, Washington Field Representative, and Kimber BRATSCH, National Compliance Manager. KRUGER said he requested the meeting because he wanted to review our requirements and he wanted to ensure they stayed in compliance. We met for about an hour and they asked many questions about our requirements. KRUGER said that HERRERA completed the records I reviewed. He explained HERRERA is responsible for all the raffles they hold in Washington. I asked how many more raffle events they planned to hold this year and they said there were six more – Gig Harbor, Colville, Centralia, Auburn, Chelan, and Davenport. HERRERA said he is the person who draws all the tickets at each event and he completes all the records. I asked KRUGER if HERRERA could buy raffle tickets and he said, no. I then asked if the people selling the tickets could buy them and KRUGER said they could. I asked if they maintained the unsold raffle tickets and HERRERA said they did not. He said he did not realize they were required to keep them but in future raffles they would.

I gave them copies of the commission's Frequently Asked Raffle Questions, the Raffle Recordkeeping Packet, and copies of several raffle rules. I told them they needed to use our recordkeeping packet. I told HERRERA to review the documents and then call me if he had any questions. I invited him to meet with me again if he felt the need. He said he would. This concluded our meeting.

After the meeting I reviewed the records a second time. I noted there were three raffles that seemed to not have been conducted using any of our authorized formats. The raffles were described as a "Duck Pond Raffle," a "Sponsor Drawing," and a "Key Prize" raffle. I sent an email to HERRERA and asked him to explain how the raffles worked. He replied and explained the following for each raffle:

- Duck Pond Raffle
- o The duck represents the raffle ticket. There are 125 ducks and each person who plays has an opportunity to pick a duck. Each duck is numbered from 1 to 125 on the underside. For each duck drawn, a corresponding number is placed in a bucket and a number is chosen to determine the winner.
- Sponsor Drawing
- o Each person who pays for a "dinner package" receives a raffle ticket, which has a "perceived" value of \$5.00.
- Key Prize Raffle
- o According to HERRERA, "There are certain items identified on our live auction which include a raffle ticket for the highest bidder of that particular item. The highest bidder of that item receives a raffle ticket and a chance of winning the key prize. The value we assign to a key prize raffle ticket is \$50.00."

After receiving HERRERA's explanations, I determined the Duck Pond Raffle violated the requirement of using raffle tickets. The Sponsor Drawing was in violation because the raffle ticket cost was included in the cost of the dinner package and was the equivalent of a "door prize" rather than a raffle. The Key Prize raffle was in violation because the only means of entry was by being the highest bidder of a live auction item. There was no specific cost of each raffle ticket.

HERRERA had sent me copies of the validated deposit receipts from the raffle. Other than the credit card sales, which totaled \$6,970.00, I was able to confirm that the raffle net receipts were deposited. I asked HERRERA to send me the bank statement that showed the credit card deposits. He sent me an email with an attached copy of a statement from "Chase Paymentech," attachment AT03. According to this statement, there were deposits from credit cards from 4/12/2015 totaling \$15,105.02. This amount was \$8,135.02 more than the raffle credit card sales of \$6,970.00. In his email, HERRERA explained that the extra credit card deposits represented other revenue. Because the raffle credit card deposits were comingled with other revenue, I was unable to compare the deposits to the credit card sales for raffle tickets. Thus, I was unable to determine if all the raffle proceeds were deposited.

On 9/14/2015 I had a conference call with HERRERA, KRUGER, and BRATSCH. I reminded them of the nature of the complaint and I said because their recordkeeping was insufficient I could not verify if all the funds were accounted for or whether or not McDONALD paid for all of his tickets. Consequently, I explained, I could not determine if the complainant's suspicions were true or false. KRUGER said he was upset at the complainant's accusation and he wished he knew who the complainant was so he could talk to him or her directly. He said their integrity is important to them and he did not like the fact



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501 S. 336th St. Suite 210, Federal Way, WA 98003
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Case Report

that someone feels they are not honest. I told him I appreciated his concerns. I then explained each violation I found and I said the commission would send them a Warning Letter detailing the violations. BRATSCH said since our meeting in July they have been using our recordkeeping forms. She added that they also have opened a gambling receipts account and they no longer commingle gambling funds with other funds. They thanked me for my time and assured me they would comply with our laws and rules in the future. This ended my conversation with them.

A Warning Letter is recommended for the following violations:

1. WAC 230-07-130(1) Failure to provide an audit trail satisfactory for us to verify that the funds were used for the licensee's stated purpose.

We received an anonymous complaint regarding the bucket raffles you conducted on April 11, 2015. The complainant was concerned the person who sold the tickets for the four bucket raffles won too many of the bucket raffle prizes. The complainant suggested the ticket seller may have stolen some of the raffle tickets and placed them in the buckets. Because you failed to maintain a Raffle Ticket Distribution Log, failed to maintain the unsold raffle tickets, operated more than one discount plan per raffle, and failed to keep gambling deposits separate from other deposits, we could not determine if all the raffle tickets and funds were accounted for.

Charitable or nonprofit licensees must maintain records which clearly show how the licensee used or disbursed the funds from each licensed activity. These records must provide an audit trail satisfactory for us to verify that the funds were used for the licensee's stated purpose(s).

2. WAC 230-11-100(1)(2)(c)(e) Failure to maintain raffle records in the format required by the commission. Failure to maintain name, address, and telephone numbers for all winners of a prize with a fair market value of more than \$50. Failure to maintain all unsold tickets for individual raffles for which gross gambling receipts exceed \$5,000.

For at least the raffles you held on April 11, 2015, you failed to maintain raffle records in the format prescribed by the commission. In addition, you failed to record all the winners' names, addresses, and telephone numbers as required. Lastly, you failed to maintain all unsold raffle tickets as required.

Licensees conducting Class E or Class F raffles or conducting raffles using alternative drawing formats must prepare a detailed record for each raffle they conduct in the standard format we provide. They must maintain the name, address, and telephone number of all winners of a prize with a fair market value of more than \$50. And they must maintain all unsold tickets for individual raffles for which gross gambling receipts exceed \$5,000.

3. WAC 230-07-090(1)(a)(c)(e) Failure to keep a separate gambling receipts account. Failure to deposit all gambling receipts first into the gambling receipts account. Failure to make all deposits of net gambling receipts separate from all other deposits.

You deposited raffle receipts from credit card sales in an account at Chase Bank. These receipts for raffle ticket sales were comingled with other kinds of sales that were not from the raffle.

Charitable or nonprofit licensees must protect all funds generated from gambling activities and keep these funds separate from their general funds. Licensees must keep a separate gambling receipts account(s) in a recognized Washington state bank, mutual savings bank, or credit union. Additionally, they must deposit all gambling receipts first into the account before spending or transferring them into other accounts, except for prize payouts. Furthermore, licensees must also make all deposits of net gambling receipts from each activity separately from all other deposits, and keep the validated deposit receipt as a part of their records.

4. WAC 230-11-025(1)(c)(d) Failure to make single non-discounted tickets available. Using more than one discount plan for each raffle.

For your "white" bucket raffle, you sold five tickets for \$20. You did not give people the option of buying one ticket. Also, you



WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

offered six different discount plans mixing various combinations of tickets from the four "white," "red," "blue," and "gold" bucket raffles.

Licensees may put tickets together in a bundle and sell them at a discount if they make single non-discounted tickets available to all participants. Licensees may only offer one discount plan for each raffle.

5. WAC 230-07-105(2) Failure to maintain an inventory control record for each item purchased or donated to use as prizes.

You failed to maintain a Merchandise Inventory Control Log.

Licensees must maintain an inventory control record for each item purchased or donated to use as prizes for gambling activities in the format we require.

6. RCW 9.46.0277 Failure to use raffle tickets. Combining the cost of a raffle ticket with the purchase of another item. Awarding raffle tickets as prizes during a live auction.

During the event held on April 11, 2015, you conducted a raffle you referred to as a "Duck Pond" raffle. Instead of using raffle tickets as required in RCW 9.46.0277, you used pre-numbered toy ducks. Also, you conducted a raffle called a "Sponsor Drawing" in which people who purchased dinner were automatically entered into a raffle rather than holding the raffle as a separate event. Additionally, you conducted a raffle called a "Key Prize" in which people who were the highest bidders during a live auction received raffle tickets.

Raffles are games in which tickets bearing an individual number are sold for not more than one hundred dollars each and in which a prize or prizes are awarded on the basis of a drawing from the tickets.



WASHINGTON STATE GAMBLING COMMISSION

501 S. 336th St. Suite 210, Federal Way, WA 98003
(425) 304-6300

Case Report

Attachments:

Document ID	Description
2015-00868-AT01	Flier sent with complaint
2015-00868-AT02	Raffle records
2015-00868-AT03	Bank statement of credit card deposits
2015-00868-AT04	Warning Letter

NORTH PUGET SOUND



Annual Event and Auction Fundraiser on Behalf of the NRA Foundation
Saturday, April 11th, 2015 @ 5:30 P.M.

Nile Shrine Country Club ~ 6601 244th ST SW ~ Mountlake Terrace, WA
 Join other Champions of the 2nd Amendment for dinner, raffles, auctions & FUN
 With a chance to win exclusive NRA Logo Firearms, Gear, Decor and Collectibles!

See Reverse Side for Full Description of all Packages

Dinner Packages

<input type="checkbox"/> \$5,500 AR-15 Builders Table	8 Firearms Included *Assembly Required	\$_____
<input type="checkbox"/> \$3,250 Premium Plus Table	8 Firearms Included	\$_____
<input type="checkbox"/> \$1,750 Premium Table	1 Firearm Choice [] A [] B	\$_____
<input type="checkbox"/> \$1,000 Full Table	1 Firearm Choice [] A [] B	\$_____
<input type="checkbox"/> \$550 Half Table	1 Firearm Choice [] A [] B	\$_____
<input type="checkbox"/> \$150 Couples Table		\$_____
<input type="checkbox"/> \$45 Single Ticket X_____		\$_____

Tax Deductible National Sponsorship (dinner ticket not included)

<input type="checkbox"/> \$250 Liberty	<input type="checkbox"/> \$600 Heritage	<input type="checkbox"/> \$1,250 Freedom	<input type="checkbox"/> \$2,500 Pioneer	\$_____
<input type="checkbox"/> \$3,500 Legacy	<input type="checkbox"/> \$5,000 Patriot	<input type="checkbox"/> \$10,000 Founding Sponsor		\$_____

Bucket Raffle Packages

<input type="checkbox"/> \$50	<input type="checkbox"/> \$100	<input type="checkbox"/> \$200	<input type="checkbox"/> \$300	<input type="checkbox"/> \$500	<input type="checkbox"/> \$1,000	\$_____
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\$20 Pre Event Raffle (not available at event, limited to 400 tickets sold, need not be present to win)

Please indicate qty you desire to purchase with prize selection: \$_____

<input type="checkbox"/> Taurus Circuit Judge .45lc / .410	<input type="checkbox"/> Stag Arms AR-15 w/ 2 nd Admendment
<input type="checkbox"/> Kimber Custom II .45acp	<input type="checkbox"/> \$400 cash

ORDER TOTAL: \$_____

Cash	Check	Credit
CreditCardNumber_____		ExDate_____
Signature_____		
Name_____		
Address_____		
City_____	State_____	Zip_____
Phone_____	Email_____	

EARLY BIRD
 Respond by Tuesday March 31st, 2015 and be entered to win a \$500 Bucket Raffle Voucher.
 To Qualify, payment and order form must be received no later than Tuesday March 31st

Call 425-280-5864 for more information or email npsfnra@gmail.com

Mail Entire Form w/ payment to:

North Puget Sound FNRA, PO Box 82067, Kenmore, WA 98028 (all sales are final)

AR Builders Table Package: \$5,500

- 8 - Dinner Tickets
- 1 - \$1,000 Bucket Raffle Package Voucher
- 24 - Sponsor Only Raffle Tickets
- 8 - DPMS Oracle Parts Kits
- 8 - FMK Polymer Lower Recievers
- Reserved Seating

Premium Plus Table Package: \$3,250

- 8 - Dinner Tickets
- 1 - \$1,000 Bucket Raffle Package Voucher
- 16 - Sponsor Only Raffle Tickets
- 8 - Kel Tec PF9 9mm Pistols
- Reserved Seating

Premium Table Package: \$1,750

- 8 - Dinner Tickets
- 8 - \$50 Bucket Raffle Package Vouchers
- 8 - Sponsor Only Raffle Tickets
- Reserved Seating
- Choice of:
 - (A) Kel-Tec KSG 12 guage shotgun
 - (B) Kimber Custom II .45acp pistol

Full Table Package: \$1,000

- 8 - Dinner Tickets
- 8 - \$50 Bucket Raffle Package Vouchers
- 8 - Sponsor Only Raffle Tickets
- Reserved Seating
- Choice of:
 - (A) Mossberg 715T .22LR Flat Top AR
 - (B) Kel-Tec PF9 9mm pistol

Half Table Package: \$550

- 4 - Dinner Tickets
- 4 - \$50 Bucket Raffle Package Vouchers
- 4 - Sponsor Only Raffle Tickets
- Reserved Seating
- Choice of:
 - (A) Henry Survival Rifle .22lr
 - (B) Heritage Rough Rider .22lr

Couples Table Package: \$150

- 2 - Dinner Tickets
- 2 - \$50 Bucket Raffle Package Vouchers
- 2 - Sponsor Only Raffle Tickets

Order MUST be received by March 25, 2015 for firearm choice to be at event. All firearms are subject to change due to availability

Bucket Raffle Packages:

- **Green Package** ~ \$50 ~ 15 White Tickets, 1 Red Ticket (Retail Value \$80)
- **Orange Package** ~ \$100 ~ 25 White Tickets, 1 Red Ticket, 1 Blue Ticket (Retail Value \$170)
- **White Package** ~ \$200 ~ 50 White Tickets, 3 Red Tickets, 3 Blue Tickets (Retail Value \$410)
- **Red Package** ~ \$300 ~ 75 White Tickets, 5 Red Tickets, 5 Blue Tickets, 1 Gold Ticket (Retail Value \$750)
- **Blue Package** ~ \$500 ~ 125 White Tickets, 9 Red Tickets, 9 Blue Tickets, 2 Gold Tickets (Retail Value \$1330)
- **Gold Package** ~ \$1,000 ~ 250 White Tickets, 18 Red Tickets, 18 Blue Tickets, 6 Gold Tickets (Retail Value \$2860)

National Sponsorships *(partially tax deductible)*

- **\$250 Liberty Sponsor** Includes 2nd Amendment Display, Sponsor Hat, Subscription to Traditions Magazine (quarterly)
- **\$600 Heritage Sponsor** Includes all Liberty Level Benefits, and your choice of Liberty Safes 9G Micro Imprint Handgun Vault w/ NRA logo or Damascus Bowie Knife with leather sheath and NRA logo
- **\$1250 Freedom Sponsor** Includes all Liberty Level Benefits and Kel-Tec SUB-2000 9mm rifle w/ NRA logo
- **\$2500 Pioneer Sponsor** Includes all Liberty Level Benefits and your choice Marlin Model 336 Limited Edition w/ Marlin horse and rider and NRA logo in 24k gold or Ruger SR1911 .45acp pistol w/ NRA logo or Remington 1911 R1 Enhanced Threaded Barrel .45acp pistol w/ NRA logo
- **\$3,500, \$5,000, \$10,000 & custom levels available**

1C, 1E

Paymentech

Deposit Activity Summary (FIN-0010)

1C, 1E

Currency Pair: Presentment: USD - U.S. Dollars/ Settlement: USD - U.S. Dollars

Reporting Period: From 04/12/2015 through 04/12/2015

4 Northeastern Boulevard, Salem, NH 03079-1952
Tel (603) 896-8333. Email: [REDACTED]

1C, 1E

Page 32 of 42

Rpt Gen: 4/13/2015 02:26:25 am ET

Financial Summary						
Successful Deposits	Sales Count	Sales Amount	Refund Count	Refund Amount	Total Deposit	Total Net Deposit
Total Successful Deposits	16					
Settled Deposits						
VISA		13				
MasterCard		2				
Total Settled Deposits	15					
Conveyed Deposits						
American Express		1				
Total Conveyed Deposits	1					

Fees & Adjustments Summary					
Total Settled Deposits Net Amount					1C, 1E
Interchange & Assessment Fees					
Paymentech Fees					
Total Fees & Adjustments					
Net Financial Activity					

Transfer Summary				
FTI #	FT #	Net Activity Date Range	Effective Date	Transfer Amount
Pending Transfers				
Total Effective Transfer				0

1C, 1E

Paymentech

1C, 1E

Currency Pair: Presentment: USD - U.S. Dollars/ Settlement: USD - U.S. Dollars

Reporting Period: From 04/12/2015 through 04/12/2015

Page 34 of 42

Rpt Gen: 4/13/2015 02:26:25 am ET

4 Northeastern Boulevard, Salem, NH 03079-1952
Tel (603) 896-8333. Email: [REDACTED]

1C, 1E

Financial Summary					
Successful Deposits	Sales Count	Sales Amount	Refund Count	Refund Amount	Total Deposit
Total Successful Deposits	27				
Settled Deposits					
VISA		19			
MasterCard		8			
Total Settled Deposits	27				

1C, 1E

Fees & Adjustments Summary					
Total Settled Deposits Net Amount					
Interchange & Assessment Fees					
Paymentech Fees					
Total Fees & Adjustments					
Net Financial Activity					

1C, 1E

Transfer Summary				
FTI #	FT #	Net Activity Date Range	Effective Date	Transfer Amount
Pending Transfers				
Total Effective Transfer				0

1C, 1E

Case Report Attachment

2015-00868-AT04

Warning Letter

Neuman, Shellie

State of Washington
Gambling Commission

In the Matter of the Warning Letter to:) No. CR 2015-00868
)
)
Name of Licensee,) DECLARATION OF MAILING
NRA FOUNDATION INC/STATE)
FUND COMMITTEE)

Shellie Neuman, Field Ops Staff, hereby declares as follows:

That on 10/20/2015, s/he enclosed in an envelope the following
document(s): Warning Letter, addressed to the following person(s):

NRA FOUNDATION INC/STATE FUND COMMITTEE

Marc Ueltschi, Chairman of the Board

And on the said day s/he had deposited the same by first class mail, with the postage thereon prepaid,
in the United States Post Office in Lacey, Washington.

Dated on 10/20/2015 at Lacey, Washington.

Shellie Neuman 10-21-15

Shellie Neuman, Field Ops Staff
FO
Washington State Gambling Commission



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest"

October 13, 2015

MARC UELTSCHI
CHAIRMAN OF THE BOARD
11250 WAPLES MILL RD
FAIRFAX, VA 22030

Commission License: 00-22598

Case Number: 2015-00868

Warning Letter

Marc Ueltschi;

This letter is to notify you of the following violations of the Washington Administrative Codes (WAC):

1. WAC 230 07 130(1) Failure to provide an audit trail satisfactory for us to verify that the funds were used for the licensee's stated purpose.

We received an anonymous complaint regarding the bucket raffles you conducted on April 11, 2015. The complainant was concerned the person who sold the tickets for the four bucket raffles won too many of the bucket raffle prizes. The complainant suggested the ticket seller may have stolen some of the raffle tickets and placed them in the buckets. Because you failed to maintain a Raffle Ticket Distribution Log, failed to maintain the unsold raffle tickets, operated more than one discount plan per raffle, and failed to keep gambling deposits separate from other deposits, we could not determine if all the raffle tickets and funds were accounted for.

Charitable or nonprofit licensees must maintain records which clearly show how the licensee used or disbursed the funds from each licensed activity. These records must provide an audit trail satisfactory for us to verify that the funds were used for the licensee's stated purpose(s).

2. WAC 230 11 100(1)(2)(c)(e) Failure to maintain raffle records in the format required by the commission. Failure to maintain name, address, and telephone numbers for all winners of a prize with a fair market value of more than \$50. Failure to maintain all unsold tickets for individual raffles for which gross gambling receipts exceed \$5,000.

For at least the raffles you held on April 11, 2015, you failed to maintain raffle records in the

format prescribed by the commission. In addition, you failed to record all the winners' names, addresses, and telephone numbers as required. Lastly, you failed to maintain all unsold raffle tickets as required.

Licensees conducting Class E or Class F raffles or conducting raffles using alternative drawing formats must prepare a detailed record for each raffle they conduct in the standard format we provide. They must maintain the name, address, and telephone number of all winners of a prize with a fair market value of more than \$50. And they must maintain all unsold tickets for individual raffles for which gross gambling receipts exceed \$5,000.

3. WAC 230 07 090(1)(a)(c)(e) Failure to keep a separate gambling receipts account. Failure to deposit all gambling receipts first into the gambling receipts account. Failure to make all deposits of net gambling receipts separate from all other deposits.

You deposited raffle receipts from credit card sales in an account at Chase Bank. These receipts for raffle ticket sales were comingled with other kinds of sales that were not from the raffle.

Charitable or nonprofit licensees must protect all funds generated from gambling activities and keep these funds separate from their general funds. Licensees must keep a separate gambling receipts account(s) in a recognized Washington state bank, mutual savings bank, or credit union. Additionally, they must deposit all gambling receipts first into the account before spending or transferring them into other accounts, except for prize payouts. Furthermore, licensees must also make all deposits of net gambling receipts from each activity separately from all other deposits, and keep the validated deposit receipt as a part of their records.

4. WAC 230 11 025(1)(c)(d) Failure to make single non discounted tickets available. Using more than one discount plan for each raffle.

For your “white” bucket raffle, you sold five tickets for \$20. You did not give people the option of buying one ticket. Also, you offered six different discount plans mixing various combinations of tickets from the four “white,” “red,” “blue,” and “gold” bucket raffles.

Licensees may put tickets together in a bundle and sell them at a discount if they make single non discounted tickets available to all participants. Licensees may only offer one discount plan for each raffle.

5. WAC 230 07 105(2) Failure to maintain an inventory control record for each item purchased or donated to use a prizes.

You failed to maintain a Merchandise Inventory Control Log.

Licensees must maintain an inventory control record for each item purchased or donated to use as prizes for gambling activities in the format we require.

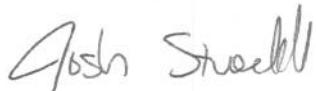
6. RCW 9.46.0277 Failure to use raffle tickets. Combining the cost of a raffle ticket with the purchase of another item. Awarding raffle tickets as prizes during a live auction.

During the event held on April 11, 2015, you conducted a raffle you referred to as a “Duck Pond” raffle. Instead of using raffle tickets as required in RCW 9.46.0277, you used pre numbered toy ducks. Also, you conducted a raffle called a “Sponsor Drawing” in which people who purchased dinner were automatically entered into a raffle rather than holding the raffle as a separate event. Additionally, you conducted a raffle called a “Key Prize” in which people who were the highest bidders during a live auction received raffle tickets.

Raffles are games in which tickets bearing an individual number are sold for not more than one hundred dollars each and in which a prize or prizes are awarded on the basis of a drawing from the tickets.

You are not being charged at this time. However, if we determine you have participated in any other violations of the gambling laws of Washington State we may recommend criminal charges are filed against you. If you have any questions, call Special Agent Danny Lisa, (206) 786 3537.

Respectfully,



Josh Stueckle
Agent In Charge

Enclosure WAC Rules

Packages:	\$20.00 Ticket White Strip (5 tickets)	\$20.00 Ticket Red	\$50.00 Ticket Blue
\$ 50.00	15	1	0
\$ 100.00	25	1	1
\$ 200.00	50	3	3
\$ 300.00	75	6	6
\$ 500.00	125	9	9
\$ 1,000.00	250	18	18

Single ticket Sales	\$20.00 Ticket White Strip (5 tickets)	\$20.00 Ticket Red	\$50.00 Ticket Blue
		2	9

Prize Winners over \$50.00:

Bucket:	Prize	Prize amount	Prize winner:
Blue	Mossberg MVP	\$ 433.00	Rod Gowdy
Blue	Springfield XD .40	\$ 410.00	Chris Cantrell
Blue	S&W Governor	\$ 500.00	Wiley Mcdonald
Red	Walther PPK/S	\$ 268.00	Mary Whitley
Red	Ruger SR 22	\$ 281.00	Lynn Glidewell
Red	NRA crimson Trace Laser grip	\$ 140.00	Wiley Mcdonald
Red	Gen III HD 7 Red Dot sight	\$ 123.00	
Gold	Kel Tec KSG 12g	\$ 690.00	Wiley Mcdonald
White	Crickett .22lr	\$ 120.00	Andrew Lorenzen
White	Henry Survival	\$ 185.00	Patrick Nielson
White	Kel Tec TCP	\$ 210.00	Wesley McDonald
White	Tasco Pro Class	\$ 70.00	
White	Vintage dome trunk & tray	\$ 74.00	

\$100.00 Ticket	# packages sold:	Total Sold:
Gold		
0	13	\$ 650.00
0	13	\$ 1,300.00
0	8	\$ 1,600.00
1	8	\$ 2,400.00
2	7	\$ 3,500.00
6	3	\$ 3,000.00

\$100.00 Ticket		Total Sold:
Gold		
	4	\$ 1,020.00

Total:	\$ 13,470.00
---------------	---------------------

Address:	Phone number	Winning Ticket Number
8035 Dibble AVE NW, Seattle, WA 98117	425-870-4980	140012
1017 300 St NW, Stanwood, WA 98292	425-344-7055	605654
12824 Dubuque Rd, Snohomis, WA 98028	425-334-2309	126934
4175 Fisherman Bay Rd, Lopez Island, WA 9826	360-468-4645	116728
PO Box 1595, Sultan, WA 98294-1595	425-319-0510	146048
12824 Dubuque Rd, Snohomis, WA 98028	425-334-2309	116793
		004311
12824 Dubuque Rd, Snohomis, WA 98028	425-328-9201	118845
5405 96 th PI NE, Marysville, WA 9827		
9500 190 PI SW, Edmonds, WA 98020		
12824 Dubuque Rd, Snohomis, WA 98028	425-334-2309	

Game:	Ticket Price	Number of tickets available	Number of tickets sold:
Card Game	\$20.00	108	106
NRA Copper coin	\$20.00	200	129
Duck Pond	\$10.00	125	125
	Red \$1.00 Blue \$2.00 Yellow \$5.00 Black \$10.00		
Bullet Board		165	165
Shot in Dark	\$10.00	125	122
Pre-Event	\$20.00	400	240

Other Raffles: *	Number of entries:	Prize	Prize Amount
Sponsor Raffle	86	Walther PK380	\$ 269.00
Key Prize	5	Henry Big Boy	\$ 670.00
Silent Auction Buy it now Raffle	24	FMK 9C	\$ 293.00

*** Raffles conducted based on live/silent auction purchases and dinner packages**

Number of unsold tickets	Gross	Prize:	Prize Amount:
2	\$2,120.00	Kimber Custom II	\$627.00
71	\$2,580.00	Henry Original .44-40	\$1,600.00
0	\$1,250.00	Beretta A300	\$ 624.00
0	\$1,250.00	Sig P320	\$ 398.00
3	\$1,220.00	S&W M&P .40	\$ 459.00
160	\$4,800.00	Stag Arms AR 15	\$ 525.00
\$13,220.00			

Winner:	Address	Phone:	Winning Ticket #:
Christopher Smith	2511 58 SE, Everett. WA 98203		145071
Charles Cambell	22021 76 W, Edmonds, WA 98026	360-267-6118	479828
Annette Eaton	15335 70 NE, Kenmore, WA 98028	206-930-9521	178025

\$26,690.00

Additional Expenses:	Net:	Winner:
\$ -	\$1,493.00	David Desmon
\$ -	\$980.00	Wiley McDonald
\$ -	\$626.00	Curtis Urban
\$ -	\$852.00	David Foos
\$ -	\$761.00	Lisa Jones
\$ -	\$4,275.00	Delvin McMillan

Address:	Phone:	Winning Ticket #:
1405 Madrona Ave., Everett, WA 98203	360-710-9504	Queen of Spades
12824 Dubuque Rd, Snohomis, WA 98028	425-334-2309	579262
18125 19th Drive, SE, Bothell, WA 98012	425-481-1929	poker chips
19928 87th Ave, SE, Snohomish, WA 98296	360-668-7107	121
11718 Fremont Ave., N., Seattle, WA 98133	206-417-4980	0047

Buckets:	Item	Price	Winning Ticket Number:
White	Flameless candles	\$ 10.00	643490
White	Stone river fire ring	\$ 50.00	578836
White	Chocolate basket	\$ 41.97	579689
White	AR mag	\$ 15.00	579687
White	Bottle opener/Root beer	\$ 35.00	643946
White	Jensen's	\$ 45.00	578824
White	Cabela's pistol case	\$ 30.00	579688
White	Rainer ballistics bullets .45	\$ 40.00	G34932
	Rainer ballistics bullets .45	\$ 40.00	612111
White	Pearl bracelet	\$ 20.00	643961
White	Desk set	\$ 20.00	643781
White	"Man cave Rules" wood sign	\$ 35.00	579656
White	American flag	\$ 30.00	644461
White	Bore snake	\$ 5.00	612102
White	Good guy sign	\$ 46.00	578884
White	Chocolate Basket	\$ 47.97	643943
White	Ted Jones print	\$ 50.00	644389
White	Dozen Assorted Girl Scout cookies	\$ 48.00	578890
White	Lady Bug tote bags (set of 2)	\$ 35.00	644611
White	"Dear" hunter wall hanging	\$ 32.00	643914
White	Limited edition friends of the NRA barometer	\$ 45.00	578359
White	Gadsden Flag with pole	\$ 35.00	578977
White	Pink daisy BB gun	\$ 36.85	640016
White	Brookstone 6 piece wine set	\$ 40.00	640355
White	6 NRA foundation blue glasses	\$ 12.00	575375
White	Blanket and tote bag	\$ 35.00	G34944
White	Dog toy basket and bed	\$ 50.00	579693
White	Pearl shell pendant	\$ 30.00	578860
White	Wine carafe and glass set	\$ 40.00	640017
	Ammo can with pistol holder, targets spots, assorted patches, exploding targets	\$ 50.00	612259
White	'Shoot to win"	\$ 20.00	578969

White	Blanket and tote bag	\$ 35.00	578843
White	Snap-on LED work light	\$ 20.00	579697
White	Rainer ballistics .40 bullets	\$ 40.00	578374
White	Rainer ballistics .40 bullets	\$ 40.00	579697
White	"hidden sparks" framed print	\$ 50.00	578860
White	For the birds (assorted garden bird items)	\$ 40.00	644615
White	Tervis tumble set	\$ 27.00	G31656
White	Max, the pouting moose bank	\$ 20.00	643775
White	Blanket and tote bag	\$ 35.00	G34962
White	223 ammo can	\$ 20.00	644622
White	Glenfield .22 LR	\$ 50.00	G31691
White	Rainer ballistics 9mm bullets	\$ 40.00	578843
White	Ceramic serving tray	\$ 20.00	G31679

Total: **\$ 1,506.79**

Date: Amount:

2/5/2015 \$ 820.00
2/5/2015 \$ 100.00
3/11/2015 \$ 960.00
3/11/2015 \$ 250.00
4/8/2015 \$ 820.00
4/8/2015 \$ 1,340.00
4/8/2015 \$ 700.00
4/8/2015 \$ 580.00
4/13/2015 \$ 14,150.00

CC sales: \$6,970.00

Total: \$ 26,690.00



WASHINGTON STATE GAMBLING COMMISSION

4565 7th Avenue SE - Lacey, WA 98503
1-800-345-2529

Case Report

Type of Incident: Compliance Inspection - Raffle Module

Disposition: NOI

Details of Disposition:

Subject/Suspect: NRA FOUNDATION INC/STATE FUND COMMITTEE

Phone: (360) 355-6213 Work

Phone: (509) 953-3378 Work

Mailing Address: 10715 VALLEY AVE E PMB 173 PUYALLUP WA 98372

Premises Address: 1617 E MAIN N106 PUYALLUP WA 98372

Org./Lic. Number: 00-22598

Date/Time Occurred: 8/22/2017

Location of Incident: NRA 1617 E MAIN N106 PUYALLUP

Potential Claimants:

Case Agent:	Supervisor:	Date Opened: 08/22/2017
Kevin Maxwell	Sonja Dolson	Date Closed: 01/21/2019

Licenses:

<u>License Number</u>	<u>Type</u>	<u>Expiration Date</u>
02-09146	02	09/30/2018

Violations:

WAC 230-11-090	(4) Authorized alternative drawing formats for members-only raffles.
WAC 230-11-100	(1) Recordkeeping requirements for Class E and F licensees and raffles using alternative drawing formats.
WAC 230-11-015	(3) Provide rules to participants.
WAC 230-11-100	(2)(c) Recordkeeping requirements for Class E and F licensees and raffles using alternative drawing formats.
WAC 230-07-090	(1)(a)(b) Keeping and depositing all gambling funds separate from other funds.
WAC 230-06-074	Assistance required for commission inspections.
WAC 230-11-025	(1)(d) Bundling and selling tickets at a discount.

Property Loss Amount:

Property Loss Description:

Related Cases:



WASHINGTON STATE GAMBLING COMMISSION

4565 7th Avenue SE - Lacey, WA 98503

1-800-345-2529

Case Report

Persons:

Name:	NRA FOUNDATION INC/STATE FUND COMMITTEE	License #:	00-22598	Subject/Suspect
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Mailing: 10715 VALLEY AVE E PMB 173 PUYALLUP WA 98372 Work: (360) 355-6213

Premises: 1617 E MAIN N106 PUYALLUP WA 98372 Work: (509) 953-3378

Employer:

Birth Date: Email:

Height: Weight: Eyes: Sex: Hair:

Race: Skin Tone: Build: Title:

Visible Marks:

Aliases:

Driver License:

Comment:

Name:	Michael Herrera	License #:	Secondary Subject
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Mailing: :

Premises: :

Employer: NRA Foundation

Birth Date: Email:

Height: Weight: Eyes: Sex: Male Hair:

Race: Hispanic/Latino Skin Tone: Build: Title: Raffle Manager

Visible Marks:

Aliases:

Driver License:

Comment:

Name:	Kimber Bratsch	License #:	Secondary Subject
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Mailing: :

Premises: :

Employer: NRA

Birth Date: Email:

Height: Weight: Eyes: Sex: Female Hair:

Race: Unknown Skin Tone: Build: Title: National Compliance Manager

Visible Marks:

Aliases:

Driver License:

Comment:

Name:	Skipp Galythly	License #:	Secondary Subject
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WASHINGTON STATE GAMBLING COMMISSION

4565 7th Avenue SE - Lacey, WA 98503

1-800-345-2529

Case Report

Mailing:

:

Premises:

:

Employer: NRA

Birth Date: Email:

Height: Weight: Eyes: Sex: Male Hair:

Race: Unknown Skin Tone: Build: Title: Secretary

Visible Marks:

Aliases:

Driver License:

Comment:

Name:	Christy Majors	License #:	Secondary Subject
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Mailing:

:

Premises:

:

Employer: NRA

Birth Date: Email:

Height: Weight: Eyes: Sex: Female Hair:

Race: Unknown Skin Tone: Build: Title: Director of Finance

Visible Marks:

Aliases:

Driver License:

Comment:



WASHINGTON STATE GAMBLING COMMISSION

4565 7th Avenue SE - Lacey, WA 98503

1-800-345-2529

Case Report

Narrative:

On August 22, 2017, I started a Class E+ Raffle Compliance Module (See Attachment 1) with NRA Foundation Inc. Raffle Manager Michael HERRERA. The purpose of my review was to determine whether the NRA Foundation was conducting their raffles in accordance with Washington State Gambling Commission Raffle rules and the proceeds from the Raffles were going towards the licensee's state purpose. The NRA foundation has multiple chapters in Washington State, but only one gambling license. In order to complete the review, and verify the licensee was accurately reporting gross receipts and prizes paid on their Raffle Activity Report, I needed to review raffle records for each chapter. HERRERA failed to bring all the records to our initial meeting and took several months getting all the raffle records and documents I required to complete my review due in part because he was moving his office to eastern Washington. Eventually, I reviewed the Raffle Summaries, Ticket Distribution Logs, Winner's Registers, and Merchandise Inventory Control Logs for all the raffles conducted by the NRA Foundation Inc., for the license year ending November 16, 2016. I also reviewed their gambling account bank statements, advertisements, invoices, winning and un-played tickets, and other documents.

The licensee conducts all their raffles at annual meetings that are open to the public. The names of the raffles seem to indicate they are alternative drawing format raffles, however, with the exception of the Card Deck Raffles, the licensee sells raffle tickets to participants. The winner of these raffles are determined by drawing the ticket out of a container. The licensee is operating Card Deck Raffles as described in WAC 230-11-090(4). However, they failed to ensure that this raffle was conducted as a member's only raffle in violation with WAC 230-11-090(4). The licensee received a verbal warning for this violation.

The licensee created their own Raffle Records in the form of excel spreadsheets. These spreadsheets include columns for all the information required in our required format. However, the information in those columns did not have the following required information for the Mount Rainier Chapter:

- 1) The Raffle Summary (See Attachment 2) does not list the cost or fair market value of all donated prizes awarded in violation of WAC 230-11-100(1). The Raffle Summary only states that these prizes are donated.
- 2) The licensee created a Purchased/Donated Merchandise record (See Attachment 3) in an Excel Spreadsheet that has a column for all the required information for a Merchandise Inventory Control Record. However, the licensee did not record the name of the donor/vendor or the date purchased/received for all items listed in violation of WAC 230-11-100. Additionally, the Reason for Inventory Removal is not adequate. Every prize listed states that the reason was "Raffle Prize". It is almost impossible to trace the prize to an individual raffle. Therefore, the licensee should include the name of the raffle where the prize was won.
- 3) The licensee failed to record the correct ticket numbers for the tickets issued for the Duck Pond Raffle on the Raffle Ticket Distribution Log (See Attachment 4) for the Mount Rainier Chapter in violation of WAC 230-11-100(1). The ticket numbers recorded on the Raffle Ticket Distribution Log are different from those recorded on the Raffle Summary (See Attachment 2) and did not add up to the number of tickets recorded as being issued.
- 4) The licensee failed to record the value of the \$100 Gift Certificate from on the Raffle Summary for the Buy It Now Auction for the Mount Rainier Chapter. In fact, the \$100 gift certificate was not on the Merchandise Inventory Control Log/Purchased/Donate Merchandise Record or the Winner's Record (See Attachment 5) in violation of WAC 230-11-100(1).
- 5) The flyer for the Meat Raffle (See Attachment 6) does not include a description of the contents of the cooler in violation of WAC 230-11-015(3). The value of contents of the cooler and the \$100 Gift Certificate from Marksman are not on the Prize Inventory Control Log or the Winner's Record and the value of all donated prizes listed on the Raffle Summary are missing in violation of WAC 230-11-100(1).

My review of the Pre-Event Raffle for the Mount Rainier Chapter found no material violation in the gross receipts reported on the Raffle Summary.

I also reviewed each chapter and my review of WA-11 found two major problems. The licensee failed to record any winner information on the Raffle Winner's Record (See Attachment 7) for any of the prizes won over \$50 in violation of WAC



WASHINGTON STATE GAMBLING COMMISSION

4565 7th Avenue SE - Lacey, WA 98503
1-800-345-2529

Case Report

230-11-100(2)(c). The licensee also materially overstated the value of prizes won in violation of WAC 230-11-100(1). While most Chapters underreported prizes paid on the raffle summary, this was most likely because they were not recording the value of donated merchandise prizes. In this case, the licensee over-reported the value of prizes awarded by \$11,802. The Raffle Summary (See Attachment 8) indicated they awarded \$21,625 and this did not include the value of prizes paid for at least three raffles. The Raffle Winners Record and the Merchandise Inventory Control Log indicated the prizes were only worth \$9823. I later received revised records, which still showed a discrepancy was \$3009 or 14% of the amount recorded on the Raffle Summary.

On July 10, 2018, I participated in a conference call involving NRA National Compliance Manager Kimber BRATSCH, Secretary Skipp GALYTHLY, and Director of Finance Christy MAJORS. The topic of this conference call involved how Credit Card Transactions were conducted and the flow of funds for the raffles. I needed to verify that the funds from the raffles went to the organization and was used for the organization's stated purpose. I had tried to obtain bank statements for several branches with the intent of verifying they received the proceeds from the raffle and that the proceeds were being used for their stated purpose. However, HERRERA did not send me the bank statements I had requested because the funds were not flowing as they normally would with a local nonprofit. WAC 230-07-090 states licensees must protect all funds generated from gambling activities and keep these funds separate from their general funds. WAC 230-070-090(1)(a) requires that licensees keep a separate gambling receipts account in a recognized Washington state bank, mutual savings bank or credit union. Subsection (1) (b) states they must deposit only gambling receipts into that account and subsection (c) states that they must deposit all gambling receipts first into the account before spending or transferring them into other accounts. BRATSCH told me that the fund raising events conducted include auctions, dinners, and sponsorships. She said that all credit card receipts (raffle and non-raffle) go directly into the National Organizations operating account (in violation of WAC 230-07-090(1) (c)). She also stated that all non-credit card sales from raffle and non-raffle activities go into the state organizations gambling account (in violation of WAC 230-07-090(1) (b)) up to the total raffle sale amount. If they don't have enough cash sales to deposit into the gambling account to account for the raffle sales, they then transfer the difference from the National Organization's account into the state organization's gambling account. They then transfer the cash back into the National Organization's operating account. If the cash from the activity is greater than the raffle sales, that cash goes into the local organization's main account and then transferred to the National Operating account after all expenses are paid. The proceeds from the raffle are divided equally between the state and the national organization and the local chapters have a meeting to decide where their 50% goes.

I asked BATSCHE and MAJORS if they had separate general ledger accounts for the different branches so I could at least track the funds that way. MAJORS said they did, but that it would take a while to get the information together.

On September 21, 2018, I finally got a response from BRATSCH, which included two documents. Neither document included any details of specific transactions or appeared to be what I knew to be a details of a general ledger account. One document (See Attachment 9) was more like a balance sheet and showed the balance of FNRA Restricted Fund balance for the Washington State as of December 31, 2017. The other document was a spreadsheet entitled "WA Event Financial Data" (See Attachment 10) and included total income and expense items for each chapter for the year. It did not include any information about specific expenses such as whom the payments went to and what they were for. However, the total drawings figure did match the gross receipts reported on their Annual Activity Report to the Gambling Commission. The licensee failed to provide the documents I requested in violation of WAC 230-06-074(3).

On October 4, 2018, I received an email from HERRERA responding to a question I had about the \$300, \$500, \$1,000, and \$2000 ticket bundles I found on several branches Raffle Summaries by providing a document with the heading "WA State FNRA Bucket Tickets". This document (See Attachment 11) showed tickets were being sold at more than one discount level in violation of WAC 230-11-025(1) (d). They sold four colored tickets (Red, White, Blue & Gold). Each ticket has a different individual price for different buckets, so that this is not a problem. However, this document also shows that there is a discount package for each different colored ticket that has a different price per ticket. This would not be a problem if this were the only discount plan and all the other requirements of WAC 230-11-025 were met. However, the licensee had five more bundles of tickets which included a variety of different combinations of Red, White, and Blue tickets. It was impossible to break down the cost per ticket in these bundles.

This case is closed with a Notice of Infraction (See Attachment 12) for the violations noted above.

**WASHINGTON STATE GAMBLING COMMISSION**

4565 7th Avenue SE - Lacey, WA 98503

1-800-345-2529

Case Report

Attachments:

Document ID	Description
2017-01149-AT01	Raffle Compliance Module Class E+
2017-01149-AT02	Mount Rainier Chapter Raffle Summary
2017-01149-AT03	Mount Rainier Chapter Purchased/Donated Merchandise Record
2017-01149-AT04	Mount Rainier Chapter Ticket Distribution Log
2017-01149-AT05	Mount Rainier Chapter Winner's Record
2017-01149-AT06	Mount Rainier Chapter Meat Raffle Flyer
2017-01149-AT07	WA-11 Winner's Record
2017-01149-AT08	WA-11 Raffle Summary
2017-01149-AT09	FNRA Restricted Fund Balance
2017-01149-AT10	WA Event Financial Data
2017-01149-AT11	WA State FNRA Bucket Tickets
2017-01149-AT12	Notice of Infraction

WASHINGTON STATE GAMBLING COMMISSION

Class E+ Raffle Compliance Guide

Licensee NRA Foundations Date 8/22/17 Agent Maxwell

Budgeted Inspection Time: 5-6 hours

Revised 6/2014
Reviewed 3/2014

	Comments	Agent
1. Obtain records of a completed raffle held during the last reporting period.		
2. Obtain documentation showing rules of operation and prizes offered on this raffle.	OK	KSm
3. Verify winning tickets are retained.	OK	KSm
4. If the individual raffle's gross receipts exceed \$5,000 count the retained unsold tickets, add to the tickets sold (from the raffle summary) and compare to the total number of tickets printed/purchased. Investigate material differences.	Licensee underreported ticket sales for pre-event raffle by \$960 or 6% of gross sales. Discrepancy	KSm
5. Trace beginning and ending ticket numbers of distribution log for this raffle to previous and following raffles (or purchase invoice if only raffle tickets were used for).	Could not trace any tickets to previous raffles	KSm
6. If tickets are bundled and sold at a discount verify it's done correctly.	OK	KSm
7. Compare gross receipts and number of tickets recorded to the Ticket Distribution Log. Review reason for any voided tickets.	Ticket Distribution Log indicates 9 tickets of \$15,420 in Raffle Summary. Discrepancy	KSm
8. Test math accuracy of Raffle Summary and supporting records.	Ticket 781-820 listed as unsold on ticket distribution log but unsold tickets listed in Raffle Summary	KSm
9. Reconcile deposits to the Ticket Distribution Log, Raffle Summary, and bank statement(s).	No deposits listed on Raffle Summary. Deposit short per ticket distribution log. Short \$960 per ticket count 6% of	KSm

10. Verify deposits were made at least once each week into a separate gambling account.	See CR 2017-01149 KSM	
11. Compare recorded prizes paid to Winner's Register.	Raffleprize value on Prize Inventory Control Record \$233 less than price listed on donation record.	KSM
12. Contact the winners of the top three prizes. Verify the prizes were received. Winner's Names 1. <u>Allen Johnson</u> (253)569-8089 - Websterdale - 4/9/16 Raffle 2. <u>Kevin Davis</u> (253)606-1596 ST 1911 4/9/16 3. <u>Dusan Bartolic</u> (253)847-3401 - Henry 44-40 - 4/9/16 OK <u>Bob Brown</u> (253)582-2726 - Remington 700 300 WSM Raffle - 4/9/16	KSM	
13. Reconcile monthly records to Annual Activity Report. *	Gross Receipts per Raffle Summary match KSM Activity Report Gross Receipts	
14. Review at least three months of the check registers and bank statements for all accounts. Obtain and review supporting documentation for questionable expenditures and transfers. Determine if expenditures are within the organization's purpose. Expenditures Reviewed	I was only able to get bank statements for gambling account. The only transactions were deposits & transfers to the NRA foundation.	XSM

General Comments:

See CR 2017-01149 for details

Disposition/action taken for violations noted:

U/W

Follow-up Required:

after 2019/2020 license year.

Raffle Summary

Licensee: NRA Foundation State Fund Committee

Date of Drawing: 4/9/16 (except Post Raffle which was 10/30/16)

Buckets:

Schedule of Deposits	
Date	Amount
4/29/2016	\$ 31,000.00
5/12/2016	\$ 41,481.00
8/23/2016	\$ 8,000.00
Total Deposits:	\$ 80,481.00

Other Required Information:			Explanation of Cash (Over)/Short:
Total Deposited	Gross Receipts	Over/Short	
\$ 80,481.00	\$ 80,481.00	\$	

Mammal

Date

10

80

Purchased/Donated Merchandise:

Description of Item:	Invoice Number:	Invoice Amount:	Number of Items	Price/ FMV Per Item	Date Purchased/ Received	Date issued	# of Items Issued	Cumulative # of Items Remaining	Reason for Inventory Removal	Vendor/Donor Name
High Point 9mm ✓	26704	\$ 302.00	1	\$ 108.00		4/9/2016	1	0	Raffle Prize	
Walther's Arms 22LR		\$ 225.00	1	\$ 225.00		4/9/2016	1	0	Raffle Prize	
Hi Point 45acp	32815	\$ 127.78	1	\$ 125.00		4/9/2016	1	0	Raffle Prize	
Hi Point 45acp	32815	\$ 127.78	1	\$ 125.00		4/9/2016	1	0	Raffle Prize	
Charter Arms Gear Bag	Donated	Donated	1	\$ 65.99		4/9/2016	1	0	Raffle Prize	
Rainier Ballistics 40cal 45acp	Donated	Donated	1	\$ 139.99		4/9/2016	1	0	Raffle Prize	Rainier Arms
NRA Gear Bag Socks and knife	Donated	Donated	1	\$ 69.00		4/9/2016	1	0	Raffle Prize	
Soft Gun Case	Donated	Donated	1	\$ 49.99		4/9/2016	1	0	Raffle Prize	
Rainier Ballistics 40cal 45acp	Donated	Donated	1	\$ 139.99	3/23/2016	4/9/2016	1	0	Raffle Prize	Rainier Arms
NRA Range Bag	Donated	Donated	1	\$ 56.00		4/9/2016	1	0	Raffle Prize	
Welcome NRA Sign	Donated	Donated	1	\$ 52.00		4/9/2016	1	0	Raffle Prize	
Cert. Annual membership for Bulls	Donated	Donated	1	\$ 100.00	3/6/2016	4/9/2016	1	0	Raffle Prize	Bull's Eye Indoor Range LLC
NRA Comical sign	Donated	Donated	1	\$ 61.00		4/9/2016	1	0	Raffle Prize	
Bags Full or Jerky	Donated	Donated	1	\$ 59.99		4/9/2016	1	0	Raffle Prize	
5.11 Bag Full of Jerky	Donated	Donated	1	\$ 65.00		4/9/2016	1	0	Raffle Prize	
.22lr Rifle cricket	20298	\$ 160.00	1	\$ 146.00	2/25/2016	4/9/2016	1	0	Raffle Prize	Keystone Sporting Arms
Elk Print & Watch		\$ 165.00	1	\$ 165.00		4/9/2016	1	0	Raffle Prize	Dave Bartholet
NRA Jacket XL	Donated	Donated	1	\$ 65.95		4/9/2016	1	0	Raffle Prize	
Sportco Gift Cert socks and Videos	Donated	Donated	1	\$ 100.00		4/9/2016	1	0	Raffle Prize	
NRA Wooden Print w/NRA Coasters	Donated	Donated	1	\$ 75.00		4/9/2016	1	0	Raffle Prize	
1 Socks DVD's NRA Knife Alpen Opti	Donated	Donated	1	\$ 200.00		4/9/2016	1	0	Raffle Prize	
.11Glasses, Socks Pocket Knife, Boo	Donated	Donated	1	\$ 125.00		4/9/2016	1	0	Raffle Prize	
2 500 packas of 9mm ammo 1 40 cal	Donated	Donated	1	\$ 90.00		4/9/2016	1	0	Raffle Prize	
Right of The People sin and knife	Donated	Donated	1	\$ 120.00		4/9/2016	1	0	Raffle Prize	
Casino Gift Basket w/dinner for 2	Donated	Donated	1	\$ 125.00		4/9/2016	1	0	Raffle Prize	
nter w/tools DVD 5.11 Socks tackle b	Donated	Donated	1	\$ 150.00		4/9/2016	1	0	Raffle Prize	
Rainier Ballistics 45 cal Alpine Optics	Donated	Donated	1	\$ 100.00		4/9/2016	1	0	Raffle Prize	Rainier Arms
Rainier Arms Upper	Donated	Donated	1	\$ 800.00	3/23/2016	4/9/2016	1	0	Raffle Prize	Rainier Arms
Ruger SR 45acp	47705	\$ 377.00	1	\$ 399.00	4/29/2016	5/7/2016	1	0	Raffle Prize	Sturm, Ruger & Co.
Montana 300 win mag	Donated	Donated	1	\$ 1,092.00	2/24/2016	4/9/2016	1	0	Raffle Prize	
Bushmaster AR	Donated	Donated	1	\$ 536.00	3/8/2016	4/9/2016	1	0	Raffle Prize	Rainier Ballistics LLC
Chiappa Rhino	53086	\$ 649.16	1	\$ 649.16		4/9/2016	1	0	Raffle Prize	
Ruger AR-15	Donated	Donated	1	\$ 599.00		4/9/2016	1	0	Raffle Prize	I-5 Guns & Ammo
Cooler full of meat	Donated	Donated	1	\$ 350.00		4/9/2016	1	0	Raffle Prize	
STI 1911		\$ 2,250.00	1	\$ 2,250.00		4/9/2016	1	0	Raffle Prize	Tim Wegner
Chiappa 22		\$ 134.00	1	\$ 134.00		4/9/2016	1	0	Raffle Prize	
Remington 870	42688	\$ 2,523.00	1	\$ 567.00	2/24/2016	10/30/2016	1	0	Raffle Prize	Remington Arms

Colt Commander	Donated	Donated	1	\$ 772.00	3/8/2016	4/9/2016	1	0	Raffle Prize	Rainier Ballistics LLC
Brunton 25-50x80mm Spotting Scope	Donated	Donated	1	\$ 244.00		4/9/2016	1	0	Raffle Prize	
Kel-tec KSG 12 GA		\$ 690.00	1	\$ 690.00		4/9/2016	1	0	Raffle Prize	
Henry 44-40	33507	\$ 1,600.00	1	\$ 1,600.00	8/10/2015	4/9/2016	1	0	Raffle Prize	Henry Repeating Arms
Freedom Sign		\$ 29.99	1	\$ 29.99		4/9/2016	1	0	Raffle Prize	
Wooden Plane		\$ 36.00	1	\$ 36.00		4/9/2016	1	0	Raffle Prize	
US Airforce Clock	41462	\$ 45.00	1	\$ 45.00		4/9/2016	1	0	Raffle Prize	Collectable Sign & Clock
Decorative Egg		\$ 40.00	1	\$ 40.00		4/9/2016	1	0	Raffle Prize	
NRA Bell		\$ 26.00	1	\$ 26.00		4/9/2016	1	0	Raffle Prize	
Toy Tank		\$ 45.00	1	\$ 45.00		4/9/2016	1	0	Raffle Prize	
2 Crocks		\$ 30.00	1	\$ 30.00		4/9/2016	1	0	Raffle Prize	
FMK 9C1 Gen2		\$ 399.99		\$ 399.99		4/9/2016	1	0	Raffle Prize	
FMK 9C1 Gen2		\$ 399.99		\$ 399.99		4/9/2016	1	0	Raffle Prize	
FMK 9C1 Gen2		\$ 399.99		\$ 399.99		4/9/2016	1	0	Raffle Prize	
Ruger 10/22 Takedown		\$ 304.00		\$ 304.00		4/9/2016	1	0	Raffle Prize	
Remington 700 300 WSM Rifle		\$ 1,298.00		\$ 1,298.00		4/9/2016		0	Raffle Prize	

Raffle Ticket Distribution Log

Licensee: NRA Foundation State Fund Committee
Total Tickets Printed: 303

Date of Drawing 4/9/2016 & 10/30/16 (post raffle only)

Game: Meat Raffle							
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Cathy Bragg	3604269157	880263-880565	303	0	0	303	\$ 1,515.00

Unissued Tickets:	0	Total:	303	0		303	\$ 1,515.00
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Total Tickets Printed: 162

Date of Drawing 4/9/2016

Game: Card Deck x3		*Tickets were unique numbers/symbols					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Allen Bragg	3604269157	Various #s/Symbols	162	34		128	\$ 2,560.00

Unissued Tickets:	0	Total:	162	34		128	\$ 2,560.00
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Total Tickets Printed: 224

Date of Drawing 4/9/2016

Game: Balloon Raffle							
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Bill Montgomery	2533777436	484312-484535	224	98		126	\$ 2,520.00

Unissued Tickets:	0	Total:	224	98		126	\$ 2,520.00
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Total Tickets Printed: 456

Date of Drawing 4/9/2016

Game: Penny Raffle							
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Justin Reynolds	2533773101	Duckband #s	456	0	0	456	\$ 2,736.00

Unissued Tickets:	0	Total:	456	0		456	\$ 2,736.00
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Total Tickets Printed: 104

Date of Drawing 4/9/2016

Game: Token Raffle							
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Mike Rasmussen	2533773452	514311-514414	104	0	0	104	\$ 2,080.00

Unissued Tickets:	0	Total:	104	0		104	\$ 2,080.00
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Total Tickets Printed: 225

Date of Drawing 4/9/2016

Game:		Square Board					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Allen Bartels	2532226901	042600-042824	225	66		159	\$ 1,590.00

Unissued Tickets:	0
Total:	225

Total Tickets Printed: 167

Date of Drawing 4/9/2016

Game:		Duck Pond					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Linda Montgomerey	2533777436	5985147-5985210	167	0	0	167	\$ 1,670.00

Unissued Tickets:	0
Total:	167

Total Tickets Printed: 300

Date of Drawing 4/9/2016

Game:		Timed 1,2 &3					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Allen bartels	2532226901	001-0100	100	7		93	\$ 1,860.00
Allen bartels	2532226901	001-0100	100	30		70	\$ 1,400.00
Allen bartels	2532226901	001-0100	100	46		54	\$ 1,080.00

Unissued Tickets:	0
Total:	300

Total Tickets Printed: 37

Date of Drawing 4/9/2016

Game:		Buy it now					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Mike McFarland	2535482165	5985114-5985150	37	0	0	37	\$ 1,850.00

Unissued Tickets:	0
Total:	37

Total Tickets Printed: 116

Date of Drawing 4/9/2016

Game:		Table Raffle					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Allen bartels	2532226901	1-116	116	19		97	\$ 1,940.00

Unissued Tickets:	0
Total:	116

Total Tickets Printed:	11
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Date of Drawing	4/9/2016
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Game:		Key Raffle					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Jim Williams	2538417113	5106420-5106430	11	1		10	\$ 1,000.00

Unissued Tickets:	0
Total:	11

Total Tickets Printed:	861
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Date of Drawing	4/9/2016
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Game:		Special Raffle					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Cary Black	2533048113	6100-6960	861	46		815	\$ 16,300.00

Unissued Tickets:	0
Total:	861

Total Tickets Printed:	1200
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Date of Drawing	4/9/2016
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Game:		Pre Raffle Package					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Cary Black	2533048113	1-1200	1200	435		765	\$ 15,300.00

Unissued Tickets:	0
Total:	1200

Total Tickets Printed:	56
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Date of Drawing	4/9/2016
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Game:		Pre Raffle Single					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Cary Black	2533048113	13201-13256	56	44		12	\$ 120.00

Unissued Tickets:	0
Total:	56

Total Tickets Printed:	983 packages and 251 singles
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Date of Drawing	4/9/2016
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Game:		Bucket Raffle					
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller
Jim Williams	2538417113	1	983	0	0	983	\$ 19,660.00
Jim Williams	2538417113	P72000-P72250	251	251	P72000-P72250	0	\$ -

Unissued Tickets:	0
Total:	983

Total:	1234	251		983	\$ 19,660.00
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Total Tickets Printed: 600

Date of Drawing 10/30/2016

Game:		Post Raffle						
Name	Phone Number	Ticket # Issued	Total Tickets Issued	Total Tickets Returned/Unsold	Ticket #s of Returned or unsold Tickets	Total tickets Sold	Funds Received From Seller	
Cary Black	2533048113	1-600	600	335		265	\$ 5,300.00	

Unissued Tickets:	0						
Total:	600		335			265	\$ 5,300.00

Licensee:	NRA Foundation State Fund Committee
Date of Raffle:	4/9/2016 and 10/30/16 (post raffle only)

Winners with prizes in excess of \$50.00

Name	Address:	City	State	Phone #	Description of prize (Indicate if Donated)	Purchase Price or FMV	Winning Ticket Number:	Date of raffle (if different than above)
Allen Bartels	8578 Vickery Ave E	Tacoma	WA	2536067150	High Point 9mm ✓	\$ 108.00	P74627	4/9/2016
Eric Rhodes	1608 145th st s	Tacoma	WA	2536061596	Walther's Arms 22LR ✓	\$ 225.00	P74249	4/9/2016
Paul Inderbitzin	5524 23rd st E	Fife	WA	2537328807	Hi Point 45acp ✓	\$ 125.00	P74802	4/9/2016
Tacoma Rifle & Rev. Club	P O Box 64777	University Pl	WA	2534607016	Hi Point 45acp ✓	\$ 125.00	P74038	4/9/2016
Victor Prouix	25018 HWY 410 E	Buckley	WA	2532290071	Charter Arms Gear Bag	\$ 65.99	P74408	4/9/2016
Tacoma Rifle & Rev. Club	P O Box 64777	University Pl	WA	2534607016	Rainier Ballistics 40cal 45acp	\$ 139.99	P74039	4/9/2016
Joseph Koczur	11622 Terry Lake Rd SW	Lakewood	WA	2533200518	NRA Gera Bag Socks and knife	\$ 69.00	P74145	4/9/2016
Phil Fortunato	33626 170th Ave SE	Auburn	WA	2062613712	Soft Gun Case	\$ 49.99	P74846	4/9/2016
James Williams	16410 96th ave ct E	Puyallup	WA	2538417113	Rainier Ballistics 40cal 45acp	\$ 139.99	P74683	4/9/2016
Mark Pidgeon	P O Box 40182	Bellevue	WA	2533701875	NRA Range Bag	\$ 56.00	P74367	4/9/2016
Robert Brown	11019 87th ave SW	Lakewood	WA	2536770568	Welcome NRA Sign	\$ 52.00	P76847	4/9/2016
Robert Brown	11019 87th ave SW	Lakewood	WA	2536770568	Gift Cert. Annuel membership for Bulls Eye	\$ 100.00	P76847	4/9/2016
Steve Hutson	1815 North Skyline Dr	Tacoma	WA	2533701875	NRA Comical sign	\$ 61.00	P74108	4/9/2016
Donna Palph	3704 164th Ave ct E	Lake Tapps	WA	2533291449	Bags Full or Jerky	\$ 59.99	P74487	4/9/2016
Donna Palph	3704 164th Ave ct E	Lake Tapps	WA	2533291449	5.11 Bag Full of Jery	\$ 65.00	P76500	4/9/2016
Tacoma Rifle & Rev. Club	P O Box 64777	University Pl	WA	2534607016	.22lr Rifle cricket	\$ 146.00	P74044	4/9/2016
James Williams	16410 96th ave ct E	Puyallup	WA	2538417113	Elk Print & Watch	\$ 165.00	P74697	4/9/2016
Mike McFarland	602 Tule Lake rd	Tacoma	WA	2535482165	NRA Jacket XL	\$ 65.95	P74571	4/9/2016
Eric Rhodes	1608 145th st S	Tacoma	WA	2536061596	Sportco Gift Cert socks and Videos	\$ 100.00	P74253	4/9/2016
Michael Istodard	12712 Lincoln Ave SW #20	Lakewood	WA	2535924728	NRA Wooden Print w/NRA Coasters	\$ 75.00	P76866	4/9/2016
Steve Hutson	1815 North Skyline Dr	Tacoma	WA	2533701875	5.11 Socks DVD's NRA Knife Alpen Optics	\$ 200.00	P74097	4/9/2016
Mike Rasmussen	2214 284th st E	Roy	WA	2533773452	5.11Glasses, Socks Pocket Knife, Book	\$ 125.00	P74766	4/9/2016
Phil Fortunato	33626 170th Ave SE	Auburn	WA	2062613712	2 500 packas of 9mm ammo 1 40 cal	\$ 90.00	P74852	4/9/2016
Cary Black	15626 63rd CT E	Sumner	WA	2533048113	Right of The People sin and knife	\$ 120.00	P74160	4/9/2016
Rainier Ballistics	4500 15th st E	Fife	WA	2539227589	Casino Gift Basket w/dinner for 2	\$ 125.00	P74443	4/9/2016
Pat Latshaw	P O Box 211	Lakebay	WA	5238840808	Bore sighter w/tools DVD 5.11 Socks tackle box	\$ 150.00	P74072	4/9/2016
Eric Rhodes	1608 145th st s	Tacoma	WA	2536061596	Rainier Ballistics 45 cal Alpine Optics	\$ 100.00	P74264	4/9/2016
Sandy Jones	43015 s York St	Bellevue	WA	4252213989	Ruger SR 45acp	\$ 399.00	112918	4/9/2016
Justin Reynolds	11215 238th St E	Graham	WA	2533773101	Montana 300 win mag	\$ 1,092.00	Joker / Red Iron Horse	4/9/2016
Shane Hall	4412 Rifle Bird Pl SW	Port Orchard	WA	3602860937	Bushmaster AR	\$ 536.00	5106426	4/9/2016
Gail Bohnas	12303 190 Ave Ct E	Bonney Lake	WA	2538620690	Chiappa Rhino	\$ 649.16	5985131	4/9/2016
Darwin Anderson	22048 159th ave St	Sumner	WA	2533122353	Ruger AR-15	\$ 599.00	484430	4/9/2016
James Williams	16410 96th ave ct E	Puyallup	WA	2538417113	Cooler full of meat	\$ 350.00	880413	4/9/2016
Kevin Davis	1608 145th st s	Tacoma	WA	2536061596	STI 1911	\$ 2,250.00	89	4/9/2016
Jeffery Decker	5514 96th St E	Puyallup	WA	5038366014	Chiappa 45-70	\$ 134.00	61	4/9/2016
Dean Latshaw	P O Box 211	Lakebay	WA	2538840808	Remington 870	\$ 567.00	5985194	10/30/2016
Melissa Reynolds	illegible	Graham	WA	2534056368	Colt Commander	\$ 772.00	6278	4/9/2016
James Williams	16410 96th ave ct E	Puyallup	WA	2538417113	Brunton 25-50x80mm Spotting Scope	\$ 244.00	42623	4/9/2016
Edith Reynolds	28110 72nd Ave Ct E	Graham	WA	2538461843	Kel-tec KSG 12 GA	\$ 690.00	514355	4/9/2016
Ryan Black	1562663 Rd st C E	Tacoma	WA	2535482165	Rainier Arms Upper	\$ 800.00	Duckband	4/9/2016

Susan Bartels	9115 262nd St E	Graham	WA	2538473401	Henry 44-40	\$ 1,600.00	11	4/9/2016
Dave Herrey	12624 48th St E	Edgewood	WA	2533502562	FMK 9C1 Gen2	\$ 399.99	Table 22	4/9/2016
Mark Wells	3212 17th St. SW	Puyallup	WA	2538410171	FMK 9C1 Gen2	\$ 399.99	Table 22	4/9/2016
Amanda Zeller	15626 63rd St Ct E	Sumner	WA	2062768042	FMK 9C1 Gen2	\$ 399.99	Table 22	4/9/2016
Ryan Black	15626 63rd St Ct E	Sumner	WA	2533048114	Ruger 10/22 Takedown	\$ 304.00	Table 22	4/9/2016
Bob Brown	11019 87th ave SW	Lakewood	WA	2535822726	Remington 700 300 WSM Rifle	\$ 1,298.00	Lost	4/9/2016
Total prizes over \$50.00:						\$ 16,388.03		

Prizes with a cost of \$50.00 or less

Number Awarded:	Prize Description	Purchase Price or FMV	Winning Ticket Number:
1	Freedom Sign	\$ 29.99	p74905
1	Wooden Plane	\$ 36.00	p74332
1	US Airforce Clock	\$ 45.00	p74330
1	Decorative Egg	\$ 40.00	p74021
1	NRA Bell	\$ 26.00	P74442
1	Toy Tank	\$ 45.00	P74866
1	2 Crocks	\$ 30.00	P74545
Total prizes \$50.00 or under:		\$ 251.99	

TOTAL PRIZES PAID OUT:	\$ 16,640.02
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MEAT
RAFFLE

\$5.00 a chance

One winner gets the following prize.

**YETI Tundra 65 Cooler
and contents**

and

**\$100.00 Gift Certificate
from Marksman**

Licensee: NRA Foundation State Fund Committee
Date of Raffle: 3/4/2016

Winners with prizes in excess of \$50.00

Prizes with a cost of \$50.00 or less

Number Awarded:	Prize Description	Purchase Price or FMV	Winning Ticket Number:

TOTAL PRIZES PAID OUT: \$ 9,823.00

Raffle Summary

Licensee: NRA Foundation State Fund Committee

Date of Drawing: 3/4/2016 &

Buckets:

					1	\$ -								\$ -	
						TOTAL:	\$ 32,875.00							TOTAL:	\$ -
						Prizes paid:	\$ 5,423.00								
						Total Expenses:	\$ -								
						NET INCOME:	\$ 27,452.00								

Other Required Information:			
Total Deposited	Gross Receipts	Over/Short	Explanation of Cash (Over)/Short:
\$ 76,585.00	\$ 76,585.00	\$ -	

Manager

Date

Preparer

Date

FNRA Restricted State Fund Balances
For the Twelve Months Ending Sunday, December 31, 2017

State Fund	Prior Year Avail Balance Incl Pending	SF Endow Trans to Restr SF	Other Additions to State Fund	Current Yr State Fund Grants	Pending Grants	State Fund Grant Adjustments	Current Yr SF Endow Transfer	Current Yr Other Transfer	Direct State Fund Adjustments	Remaining Prior Year Balance Avail	Current Yr Temp Restr Event Activity	Add Back Pending Grants	Temporarily Restricted SF Balance	
Alaska	AK													
Alabama	AL													
Arkansas	AR													
Arizona	AZ													
California - Central	CAC													
California - Eastern	CAE													
California - Northern	CAN													
California - Middle	CAM													
California - Southern	CAS													
Colorado	CO													
Connecticut	CT													
Delaware	DE													
Florida	FL													
Georgia	GA													
Hawaii	HI													
Iowa	IA													
Idaho	ID													
Illinois - North	ILN													
Illinois - South	ILS													
Indiana	IN													
Kansas	KS													
Kentucky	KY													
Louisiana	LA													
Massachusetts	MA													
Maryland	MD													
Maine	ME													
Michigan	MI													
Minnesota	MN													
Missouri	MO													
Mississippi	MS													
Montana	MT													
Nebraska	NE													
Nevada	NV													
New Hampshire	NH													
New Jersey	NJ													
New Mexico	NM													
New York - Lower	NYL													
New York - Upper	NYU													
North Carolina - East	NCE													
North Carolina - West	NCV													
North Dakota	ND													
Ohio	OH													
Oklahoma	OK													
Oregon	ORE													
Pennsylvania - East	PAE													
Pennsylvania - West	PAW													
Rhode Island	RI													
South Carolina	SC													
South Dakota	DS													
Tennessee	TN													
Texas - Eastern	TXE													
Texas - Northern	TXN													
Texas - Southern	TXS													
Texas - Western	TXW													
Utah	UT													
Vermont	VT													
Virginia	VA													
Washington	WA	289,326.68	0.00	4,532.57	(252,412.59)	(7,911.00)	(9,089.15)	(4,411.00)	(3,500.00)	(8,603.54)	(12,086.03)	263,791.85	7,911.00	259,636.82
West Virginia	WV													
Wisconsin	WI													
Wyoming	WY													
Total	TOTAL													

FNRA Restricted State Fund Balances
For the Twelve Months Ending Saturday, December 31, 2016

State Fund	Prior Year Avail Balance Incl Pending	SF Endow Trans to Restr SF	Other Additions to State Fund	Current Yr State Fund Grants	Pending Grants	State Fund Grant Adjustments	Current Yr SF Endow Transfer	Current Yr Other Transfer	Direct State Fund Adjustments	Remaining Prior Year Balance Avail	Current Yr Temp Restr Event Activity	Add Back Pending Grants	Temporarily Restricted SF Balance
Alaska	AK												
Alabama	AL												
Arkansas	AR												
Arizona	AZ												
California - Central	CAC												
California - Eastern	CAE												
California - Northern	CAN												
California - Southern	CAS												
Colorado	CO												
Connecticut	CT												
Delaware	DE												
Florida	FL												
Georgia	GA												
Hawaii	HI												
Iowa	IA												
Idaho	ID												
Illinois - North	ILN												
Illinois - South	ILS												
Indiana	IN												
Kansas	KS												
Kentucky	KY												
Louisiana	LA												
Massachusetts	MA												
Maryland	MD												
Maine	ME												
Michigan	MI												
Minnesota	MN												
Missouri	MO												
Mississippi	MS												
Montana	MT												
Nebraska	NE												
Nevada	NV												
New Hampshire	NH												
New Jersey	NJ												
New Mexico	NM												
New York - Lower	NYL												
New York - Upper	NYU												
North Carolina - East	NCE												
North Carolina - West	NCW												
North Dakota	ND												
Ohio	OH												
Oklahoma	OK												
Oregon	OREGON												
Pennsylvania - East	PAE												
Pennsylvania - West	PAW												
Rhode Island	RI												
South Carolina	SC												
South Dakota	DS												
Tennessee	TN												
Texas - Northern	TXN												
Texas - Southern	TXS												
Texas - Western	TXW												
Utah	UT												
Vermont	VT												
Virginia	VA												
Washington	WA	221,612.36	0.00	14,573.90	(188,778.21)	(11,990.00)	(5,209.79)	(5,990.00)	(6,000.00)	(8,054.81)	10,163.45	247,175.23	11,990.00
West Virginia	WV												
Wisconsin	WI												
Wyoming	WY												
Total	TOTAL												269,328.68

Expenses

Committee Number	Ticket Receipts	Live Receipts	Silent Receipts	Drawings	Contribution Receipts	Sponsor Receipts	Total	Facility	Food	Admin	Standard Merchandise	Optional Merchandise	VDO Merchandise	Local Merchandise	Acusport	AcuSport No Draw	Miscellaneous Expenses	Total Expenses	Net Revenue	
WA-10	13,579.61	9,080.00	4,572.00	37,300.00	1,010.00	-	65,541.61	5,242.05	4,930.35	1,700.00	6,904.00	5,365.00	2,041.37	1,239.88	-	-	11,141.00	40,324.79	25,216.82	
WA-11	27,363.00	16,380.00	4,485.00	76,585.00	525.00	-	125,338.00	17,451.16	-	1,700.00	6,160.00	4,275.00	522.47	22,094.45	-	-	3,720.35	56,620.84	68,717.16	
WA-12	11,757.22	23,200.00	4,206.00	56,370.00	925.00	1,850.00	98,308.22	2,724.77	10,584.73	1,700.00	6,122.00	21,872.33	-	852.48	-	-	5,556.72	51,062.08	47,246.14	
WA-13	19,706.00	9,270.00	3,510.00	46,200.00	5,276.00	2,500.00	86,462.00	11,391.81	-	1,700.00	6,367.00	16,015.00	834.56	13,852.40	-	-	1,715.36	54,322.66	32,139.34	
WA-14	1,235.01	15,730.00	4,902.00	80,481.00	4,557.00	-	106,905.01	-	8,850.00	1,700.00	5,290.00	11,726.00	1,633.28	13,174.17	-	-	350.83	44,891.28	62,013.73	
WA-16	11,482.07	11,052.00	4,102.00	33,455.00	-	-	60,091.07	4,879.98	-	1,700.00	5,390.00	18,343.00	574.23	1,839.42	-	-	34,784.19	25,306.88		
WA-17	7,239.75	8,490.00	2,279.00	36,778.24	6,420.00	-	61,206.99	791.06	4,902.10	1,700.00	5,390.00	11,240.40	5,658.75	1,681.22	-	-	416.60	34,152.02	27,054.97	
WA-1A	-	-	-	-	-	-	-	-	400.00	-	507.00	-	-	-	-	-	907.00	(907.00)		
WA-22	9,455.00	11,900.00	2,620.00	25,835.00	220.00	-	50,030.00	793.80	3,412.50	1,700.00	5,390.00	12,176.35	581.99	1,040.00	-	-	2,087.01	27,983.49	22,046.51	
WA-24	11,600.00	6,275.00	1,340.00	20,840.00	-	-	40,055.00	-	3,109.00	1,700.00	5,675.00	8,565.00	752.16	6,884.50	-	-	66.84	27,398.41	12,656.59	
WA-26	12,331.00	7,055.00	2,165.00	26,070.00	1,860.00	750.00	50,231.00	793.00	6,124.03	1,700.00	5,469.00	7,756.37	4,030.31	5,249.18	-	-	1,108.00	34,720.34	15,510.66	
WA-29	8,400.00	9,165.00	2,060.00	27,150.00	1,800.00	1,100.00	49,675.00	6,324.78	-	1,700.00	7,753.00	10,642.10	698.41	2,611.39	749.00	749.00	-	32,422.32	17,252.68	
WA-31	6,640.00	7,470.00	-	35,620.00	-	-	47,730.00	2,970.00	-	1,700.00	5,390.00	5,949.00	-	8,808.94	-	-	25,258.42	22,471.58		
WA-32	3,125.55	8,150.00	2,711.00	17,110.00	799.95	-	31,896.50	-	3,500.00	1,700.00	5,333.00	6,328.00	140.00	450.00	-	-	500.00	18,069.60	13,826.90	
WA-35	12,761.00	4,180.00	1,210.00	12,380.00	1,372.00	-	31,903.00	-	3,363.75	1,700.00	5,390.00	3,380.00	456.94	838.69	-	-	522.24	16,119.67	15,783.33	
WA-43	6,625.00	15,375.00	2,420.00	33,220.00	8,000.00	-	65,640.00	6,411.00	-	1,700.00	5,390.00	9,664.35	1,981.45	3,199.98	-	-	28,346.78	37,293.22		
WA-46	9,786.00	7,813.00	1,160.00	7,670.00	-	-	26,429.00	3,772.32	-	1,700.00	5,390.00	4,991.00	1,237.41	244.18	-	-	-	17,416.17	9,012.83	
WA-47	5,233.00	5,070.00	1,080.00	20,830.00	1,800.00	-	34,013.00	150.00	2,337.75	1,700.00	6,652.00	7,379.35	1,785.92	500.00	-	-	100.00	20,839.92	13,173.08	
WA-52	2,242.05	9,190.00	1,240.00	11,935.00	728.95	600.00	25,936.00	500.00	2,117.50	1,700.00	5,675.00	4,785.00	-	100.00	-	-	1,307.67	16,223.17	9,712.83	
WA-55	8,723.00	11,885.00	2,189.00	20,320.00	1,108.00	-	44,225.00	1,150.00	2,948.63	1,700.00	5,390.00	13,819.35	2,955.82	400.00	-	-	-	28,443.95	15,781.05	
Other																	(3,041.16)	(3,041.16)	3,041.16	
	189,284.26	196,730.00	48,251.00	624,149.24	36,401.90	6,800.00	1,101,616.40	65,345.73	56,180.34	32,700.00	110,520.00	184,779.60	25,885.07	85,060.88	749.00	749.00	25,551.46	607,265.94	494,350.46	

WA STATE FNRA Bucket Tickets

Single Tickets

Label	QTY	Color	Cost
A	1 ticket	Red	10.00
B	1 ticket	White	5.00
C	1 ticket	Blue	30.00
D	1 ticket	Gold	100.00

Discount Packages

Label	QTY	Color	Cost
E	3 tickets	Red	20.00
F	25 tickets	White	50.00
G	6 tickets	Blue	150.00
H	3 tickets	Gold	250.00

PREFERRED BUCKET TICKET BUNDLES

You Pay:

\$100 25 White, 3 Red, 1 Blue
 \$300 50 White, 3 Red, 7 Blue
 \$500 50 White, 7 Red, 6 Blue, 2 Gold
 \$1,000 50 White, 15 Red, 12 Blue, 6 Gold
 \$2,000 50 White, 30 Red, 18 Blue, 15 Gold

Single Ticket Value

1F + 1E + 1C	185.00
2F + 1E + 1C + 1G	490.00
2F + 2E + 1A + 1G + 2D	700.00
2F + 5E + 2G + 2H	1,360.00
2F + 10E + 3G + 5H	2,590.00

Washington State Gambling Commission
Notice of Infraction



Licensee: NRA Foundation	City: Puyallup	Case # 2017-01149
Date: 1/17/19	Organization # 00-22598	
Name of Person: Michael Herrera	Title: Raffle Manager	
(1) WAC 230-06-074(3) Description: License failed to provide reasonable assistance during my review by failing to provide requested records in a timely manner and failing to provide all requested bank statements & check registers.		
(2) WAC 230-11-025(1)(d) Description: Licensee failed to sell raffle tickets at no more than one discount level.		
(3) WAC Description:		
THIS NOTICE OF INFRACTION, AS NOTED, IS A VIOLATION OF LAWS OR RULES. THIS IS BROUGHT TO YOUR ATTENTION, REQUESTING YOUR VOLUNTARY COOPERATION IN CORRECTING OR AVOIDING FUTURE VIOLATIONS. IF YOU HAVE QUESTIONS, PLEASE CONTACT YOUR LOCAL COMMISSION AGENT.		
Special Agent Signature: <i>Kevin Maxwell</i>	Date: 1/17/19	

GC3-97 04/05

Washington State Gambling Commission
Notice of Infraction



Licensee: NRA Foundation	City: Puyallup	Case # 2017-01149
Date: 1/17/19	Organization # 00-22598	
Name of Person: Michael Herrera	Title: Raffle Manager	
(1) WAC 230-11-100(1)		
Description: Licensee failed to accurately record all the required information in the standard format we require.		
(2) WAC 230-11-015(3)		
Description: Licensee failed to disclose all prizes available in writing at the point of sale for at least the Mount Rainier Chapter Meat Raffle		
(3) WAC 230-07-090(1)(a)		
Description: Licensee failed to keep gambling receipts separate from all other funds and to deposit only all gambling receipts into the account first before spending or transferring.		
THIS NOTICE OF INFRACTION, AS NOTED, IS A VIOLATION OF LAWS OR RULES. THIS IS BROUGHT TO YOUR ATTENTION, REQUESTING YOUR VOLUNTARY COOPERATION IN CORRECTING OR AVOIDING FUTURE VIOLATIONS. IF YOU HAVE QUESTIONS, PLEASE CONTACT YOUR LOCAL COMMISSION AGENT.		
Special Agent Signature: <i>Kevin J. Maxwell</i>	Date: 1/17/19	

GC3-97 04/05

**Route Book
00-22598
NRA FOUNDATION INC/STATE FUND COMMITTEE
PUYALLUP
From January 01, 2014 to September 24, 2019**

10/22/2018	Sent email to Michael Herrera reminding him their QAR is due 10/30/18.	KevinM
04/20/2018	ASSISTANCE RAFFLE - - NRA FOUNDATION INC/STATE FUND COMMITTEE 0.50 hrs	KevinM
04/19/2018	ASSISTANCE RAFFLE - - NRA FOUNDATION INC/STATE FUND COMMITTEE 0.50 hrs	KevinM
04/11/2018	T/T Michael Herrera regarding license fee restructure to include quarterly reporting and late fees . I also sent him an email with the license fee restructure brochure and the fee schedule as well as a link to the license fee calculator on our website.	KevinM
04/11/2018	ASSISTANCE RAFFLE - - Fee Simplification NRA FOUNDATION INC/STATE FUND COMMITTEE 0.10 hrs	KevinM
08/15/2017	COMPLIANCE INSPECTION RAFFLE - MODULE 1 - NRA FOUNDATION INC/STATE FUND COMMITTEE 0.50 hrs	KevinM
08/08/2017	COMPLIANCE INSPECTION RAFFLE - MODULE 1 - NRA FOUNDATION INC/STATE FUND COMMITTEE 0.50 hrs	KevinM
12/13/2016	SPOT INSPECTION RAFFLE - - NRA FOUNDATION INC/STATE FUND COMMITTEE PHONE DISCUSSION WITH MICHAEL H. 1.00 hrs	BillM
12/12/2016	ASSISTANCE RAFFLE - - NRA FOUNDATION INC/STATE FUND COMMITTEE 1.00 hrs	BillM
09/26/2014	ASSISTANCE LICENSEE - NON PROFIT - NRA FOUNDATION INC/STATE FUND COMMITTEE 2.00 hrs	BillM
04/15/2014	ASSISTANCE LICENSEE - NON PROFIT - NRA FOUNDATION INC/STATE FUND COMMITTEE 2.00 hrs	travisw